

*Final
General Management Plan
Environmental Impact Statement*



**Mary McLeod Bethune Council House
National Historic Site**

Washington, D.C.

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General Management Plan / Environmental Impact Statement

Mary McLeod Bethune Council House
National Historic Site
Washington, District of Columbia

The National Park Service is preparing a general management plan to clearly define a direction for resource preservation and visitor use at the Mary McLeod Bethune Council House National Historic Site for the next 10 to 15 years. A general management plan takes a long-range view and provides a framework for proactive decision making about visitor use, managing the natural and cultural resources at the site, developing the site, and addressing future opportunities and problems. This is the first NPS comprehensive management plan prepared for the national historic site. As required, this general management plan presents to the public a range of alternatives for managing the site, including a preferred alternative; the management plan also analyzes and presents the resource and socioeconomic impacts or consequences of implementing each of those alternatives in the "Environmental Consequences" section of this document.

All alternatives propose new interpretive exhibits. **Alternative 1**, a "no-action" alternative, presents what would happen under a continuation of current management trends and provides a basis for comparing the other alternatives. **Alternative 2**, the preferred alternative, expands interpretation of the house and the life of Bethune, and the archives. It recommends the purchase and rehabilitation of an adjacent row house to provide space for orientation, restrooms, and offices. Moving visitor orientation to an adjacent building would provide additional visitor services while slightly decreasing the impacts of visitors on the historic structure. In addition, the proposed changes to the archives would expand the audience that could be reached via electronic media. Administrative functions would be separate from the visitor areas. Archival research would be concentrated onsite. Collections and processing would also be onsite. When necessary, archival collections would be moved to the Museum Resource Center for preservation and storage.

Alternative 3 expands interpretation to those people wanting longer, more in-depth information on the site and expands outreach programs to accommodate wider audiences. This alternative proposes the purchase or lease of additional nearby space for offices, meetings, and orientation and would decrease ranger-guided tours and increase self-guided tours (compared to existing conditions) of the council house. This alternative also proposes the expansion of the carriage house/archives and increased services to a narrower audience — those people who would be attending seminars and workshops. Orientation and visitation services would be shifted to the new space. This alternative would also increase the number of people reached through outreach programs. Offsite interpretation, including traveling exhibits, would be expanded. **Alternative 4** emphasizes interpretation of the life and legacy of Mary McLeod Bethune. This alternative proposes building a larger structure to replace the carriage house and moving the archives offsite to a leased space, providing needed space for restrooms and bookstore. Thus, implementation of alternative 4 would increase exhibit space and provide space for new exhibits. The site staff would provide in-depth interpretation of Dr. Bethune and her contributions, and exhibits in the house would include historic and period furnishings from the years when she used the house as the headquarters for the National Council of Negro Women.

For more information about this document, contact the Site Manager Diann Jacox, Mary McLeod Bethune National Historic Site, 1318 Vermont Avenue, NW, Washington, D.C., 20005, at 202-673-2402, or via email at Diann_Jacox@nps.gov.

SUMMARY

Mary McLeod Bethune, was a renowned educator, organizer, national political leader, president of the National Association of Colored Women, and founder of the National Council of Negro Women. What is now the Mary McLeod Bethune Council House National Historic Site was her official Washington, D.C., address (1943–49), and it is at this site that Mary McLeod Bethune achieved her greatest national and international recognition. At this site, the first headquarters of the National Council of Negro Women, Bethune and the council spearheaded strategies and developed programs that advanced the interests of African American women and the black community. The site is also the location of the National Archives for Black Women's History.

The 1991 legislation that gave the National Park Service the authority to acquire and manage this national historic site also created a 15-member Federal Advisory Commission. This commission participates in an advisory capacity to develop the general management plan. The commission is composed of experts in areas relating to the historic site and archives and Dr. Bethune.

The National Park Service intends to arrive at a comprehensive direction for managing the site through public participation. Therefore, public input is an important aspect of establishing the desired resource and visitor experience conditions that will guide the management of the national historic site.

Many issues and concerns have been identified by NPS staff, the Federal Advisory Commission, and the general public as part of the scoping (initial planning efforts) for this general management plan. Comments were solicited at public meetings, through planning newsletters, and on the Internet.

This general management plan is required to present to the public a range of alternatives for managing the site, including a preferred alternative. In this document there are four alternatives. The plan is also required to analyze and present the environmental and socioeconomic impacts or consequences of implementing each of those alternatives – the environmental impact statement part of this document. A summary of the alternatives and the important impacts is given below.

SUMMARY OF ALTERNATIVES AND IMPACTS

Alternative 1, No Action

Current operations, with limited space, staff, and budget, would continue at the site. No additional property would be acquired or leased. Visitor facilities would continue to be inadequate, and facilities would remain inaccessible to visitors and employees with mobility disabilities. The second-floor, single-toilet restroom would continue to be used for visitors, including those arriving in groups. The limited administrative and visitor orientation functions would remain in the council house, and the archives would remain in the carriage house, which does not provide the physical environment for professional curatorial standards and would not have room for storing the additional collections expected.

The interpretive program, which focuses on Dr. Bethune, the council house, and the National Council of Negro Women, would continue to be less comprehensive than is desired. Space for researchers and their work would continue to be inadequate. The council house would continue to be preserved as funding permits and in response to structural deterioration, without a more proactive preservation plan.

The main impacts of implementing this alternative would be that the above-mentioned undesirable conditions would continue and the quality of the visitor experience would continue to be adversely affected.

Alternative 2 – Preferred

In this alternative the national historic site would place a dual emphasis on the council house, which would be used as a museum, and on the archives. Both the museum and the archives would be expanded and linked by using the archival materials in changing interpretive exhibits and programs. The interpretation would provide a broad and balanced program and a more in-depth treatment of Dr. Bethune's role as a public figure and organizer.

Dr. Bethune's vision of an expansive archival collection of African American women's history would be achieved. The archives would become a significant, state-of-the-art research institution and a modern repository that meets current professional archival management standards. Research capabilities and services would be improved through the use of advanced technology. Archival research would be concentrated onsite. Collections and processing would also be onsite. When necessary, archival collections would be moved to the Museum Resource Center for preservation and storage. Additional acquired property for offices and visitor orientation and an increase in staff (to 13 instead of the current six) would be a necessity for implementing this alternative.

The main impacts of implementing this alternative would be increased space, which would provide an orientation area for groups, accessibility for those with mobility handicaps, and accessible restrooms. It would also provide more space for staff and exhibits. The addition of doorways would have a minor impact on the historic proper-

ty. There would be additional space for the archives, as well as enhanced environmental protection and updated technological access.

Alternative 3

The national historic site would commemorate Mary McLeod Bethune through the establishment of the Bethune Center for Human Rights. The center would continue Dr. Bethune's legacy by using the council house as a base for stimulating social change. While retaining the archival resources and the house as a museum, the site would provide the place for community and activist groups to meet and engage in activities, workshops, and programs. Interpretive themes would emphasize Dr. Bethune's legacy. Groups using the facilities would include those with whom Dr. Bethune and the National Council of Negro Women worked, as well as other organizations that would encourage social change in accord with Dr. Bethune's ideals. Lectures and receptions for educational and activist groups would take place, with emphasis on literacy and voices of the civil rights and human rights movement.

Archival collections also would emphasize materials related to social justice and human rights. Leased or acquired property and an increase in staff (to 14 from the current six) would be a necessity for implementing this alternative.

The main impacts of implementing this alternative would be increased space, which would provide an orientation area for groups, more space for exhibits and staff, and more space for meetings and programs. This space would be separate from the council house, requiring programmatic interpretation. There would also be more space for the archives, which would have enhanced environmental protection. The addition of the archival space would have adverse impacts on the carriage house.

Alternative 4

The national historic site would commemorate the life and times of Mary McLeod Bethune by managing the council house as a traditional NPS historic museum. The site staff would provide in-depth interpretation of Dr. Bethune and her contributions, and exhibits in the house would include historic and period furnishings from the years when she used the house as the headquarters for the National Council of Negro Women. Most of these exhibits would be permanent, with some changing exhibits. The emphasis of the archival collections would be to illustrate the highlights of her life and activities as well as the era in which she lived and the contemporaries with whom she worked. Offsite space for the archival collections would be a necessity for implementing this alternative, as would hiring one additional staff member.

The main impacts of implementing this alternative would be the removal and

reconstruction of the carriage house. Moving the archives to a leased facility would open additional space onsite for offices, a bookstore, and restrooms, leaving more room in the council house for exhibits and interpretation.

COMMENTS ON THE DRAFT PLAN

Some minor elements of the preferred alternative and other alternatives were modified to address comments on the draft plan. This *Final General Management Plan / Environmental Impact Statement* includes agency letters and letters and responses to all substantive comments. The final plan will be approved (through a record of decision) after a minimum 30-day no-action period. See the “Responses to Comments on the Draft Plan” section for details on the changes in the final plan.

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INTRODUCTION

PURPOSE OF AND NEED FOR THE GENERAL MANAGEMENT PLAN

PURPOSE AND NEED

General management plans are required for each unit of the national park system. The purpose of this general management plan is to provide a clearly defined direction for visitor use and resource preservation and to provide a basic foundation for decision making and managing the national historic site for the next 10 to 15 years.

The Mary McLeod Bethune Council House National Historic Site is a relatively new unit of the national park system. This is the first NPS comprehensive management plan prepared for the national historic site. This general management plan provides the guidance for managing the Mary McLeod Bethune Council House National Historic Site. A general management plan purposefully takes a long-range view and provides a framework for proactive decision making, including decisions on visitor use, managing the natural and cultural resources at the site, developing the site, and addressing future opportunities and problems.

THE PLANNING PROCESS

The 1991 legislation that gave the National Park Service the authority to acquire and manage this national historic site (see appendix A) also created a 15-member Federal Advisory Commission (see next section). This commission, composed of experts in areas relating to the historic site and archives and Dr. Bethune, participates in an advisory capacity to help develop the general management plan.

This general management plan was developed by a multidisciplinary team that includes NPS staff and four members of the Federal Advisory Commission that serve directly on the general management plan planning team.

Because the National Park Service sees public input as an important aspect of establishing the desired resource and visitor experience conditions that will guide the management of the national historic site, public participation was solicited in the planning process. This public participation is described in the "Consultation and Coordination" section of this document. Suggestions from the public have been incorporated into the proposed management alternatives in this document.

The National Park Service is required to present a range of alternatives for managing the site, including a preferred alternative (the "Alternatives including the Preferred Alternative" section), and to analyze the environmental and socioeconomic impacts or consequences of implementing each of the alternatives (the "Environmental Consequences" section of this document). Various elements of the preferred alternative and other alternatives were modified to address comments on the draft plan. This *Final General Management Plan / Environmental Impact Statement* includes agency letters and responses to all substantive comments. The final plan will be approved (through a record of decision) after a minimum 30-day no-action period. See the "Responses to Comments" section for details on the changes in the final plan.

BRIEF DESCRIPTION OF THE NATIONAL HISTORIC SITE AND ITS BEGINNINGS

BACKGROUND AND DESCRIPTION

Mary McLeod Bethune, was a renowned educator, organizer, national political leader, president of the National Association of Colored Women, and founder of the National Council of Negro Women (NCNW). What is now the Mary McLeod Bethune Council House National Historic Site was her official Washington, D.C., address (1943–49), and it is at this site that Mary McLeod Bethune achieved her greatest national and international recognition, receiving heads of state, government officials, and leaders from across the world. At this site, the first headquarters of the National Council of Negro Women, Bethune and the council spearheaded strategies and developed programs that advanced the interests of African American women and the black community. The site is also the location of the National Archives for Black Women's History.

The site, at 1318 Vermont Avenue NW, Washington, D.C., (see Vicinity map) includes a row house and a carriage house. The brick row house, constructed in 1875 in the Second Victorian Empire architectural style, has a three-story façade, raised basement, bay window, and tin-covered mansard roof. The structure reflects many of the changes in building regulations during the development of new neighborhoods in the District of Columbia. Its transition from a single-family home for the upper middle class in the late 19th century, to a residence and shop in the early 20th century, to the headquarters of the National Council of Negro Women from 1943 to 1966, and now to a house museum and archival facility, exemplifies the shifting nature of the Logan Circle area. Architecturally, the neighborhood has retained its historic character and

has been listed on the National Register of Historic Places as the Logan Circle Historic District (see Logan Circle Historic District and Site Circulation Plan maps).

During the past century, this neighborhood has changed from an affluent, nearly all-white community, to an enclave of the African American elite, and finally to a racially mixed district. In recent years, several of the larger structures in the neighborhood have been converted to condominiums, older structures are being rehabilitated, and vacant lots are being developed for new building units. Dr. Bethune's association with the house made the building a center of significant political activity during the 1940s – as a meeting place for the National Council of Negro Women, which was often attended by prominent figures, including Eleanor Roosevelt. The house has been modified over the years, and a fire during the 1960s caused extensive water and smoke damage to the interior. The building structure and its front architectural façade still have a high degree of historic integrity. The rear porch/patio area has had extensive alterations. Although the house has been modified, the basic floor plan remains unchanged. The interior has been restored to a high level of quality, but retains little historic integrity.

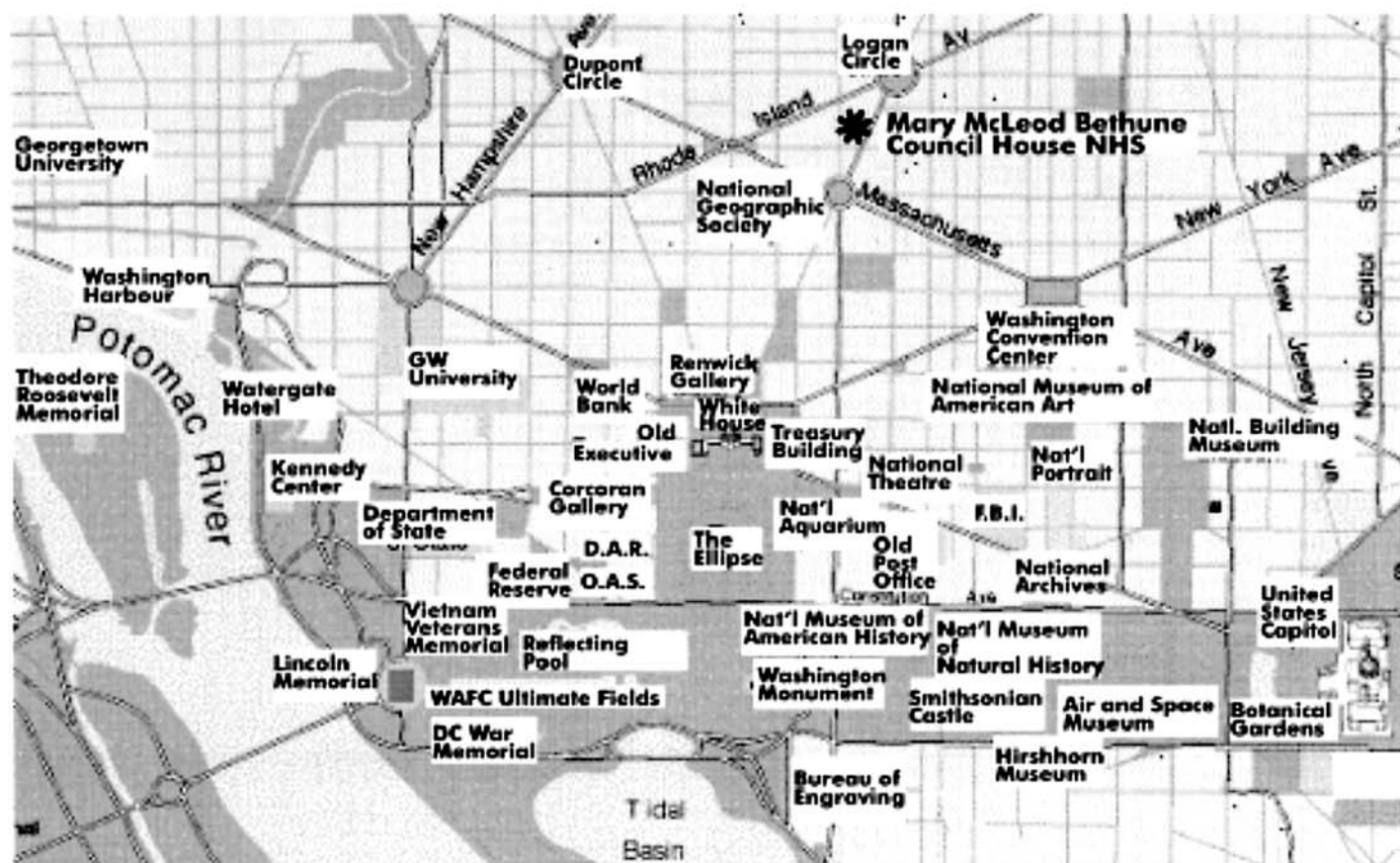
The brick carriage house contains the National Archives for Black Women's History – the largest archive that is dedicated only to the documentation of African American women's history. Before Dr. Bethune's time, black women's history had been neglected because the primary sources needed to document that history had not been collected and were thus unavailable for researchers. These archival collections are serving as a research



Portrait of Mary McLeod Bethune by Robert Scurlock, ca 1940. NPS photo.



Mary McLeod Bethune speaking at the October 19, 1944, dedication ceremony for the National Council of Negro Women's new headquarters. Seated behind her are some of the distinguished guests, including Eleanor Roosevelt and Charlotte Hawkins Brown. NPS photo.



Downtown Washington, D.C.



Mary McLeod Bethune
Council House NHS



Vicinity Map

Mary McLeod Bethune
Council House NHS
General Management Plan

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
DSC/DEC 00/021/20.000



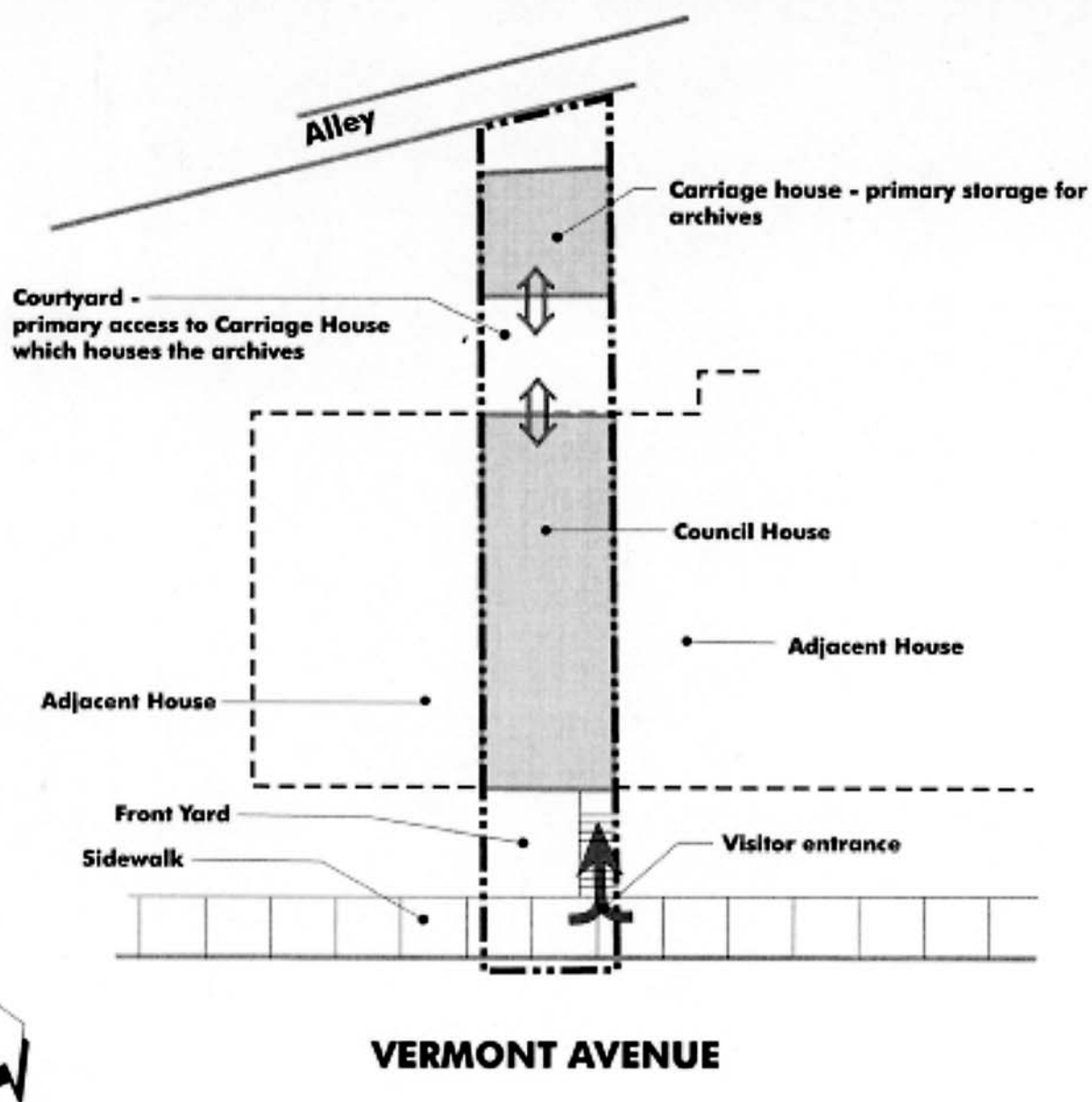
- Logan Circle Historic District Boundary
- * Historic landmark (includes buildings, building clusters, statues, monuments, bridges, and other structures)
- Historic parks, cemeteries, campuses, and places



Logan Circle Historic District

Mary McLeod Bethune
Council House
National Historic Site
General Management Plan

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
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Site Circulation Plan

Mary McLeod Bethune

Council House NHS

General Management Plan

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
DSC/DEC 00/021/20,002

center and an archival repository for the study of African American women's achievements and heritage. This commemoration of the lives and contributions of African American women perpetuates Mary McLeod Bethune's legacy of leadership, commitment, and service.

Constructed during the early 1890s, the two-story brick carriage house has undergone significant interior and exterior changes. The interior was completely gutted during 1988-91 and converted into a space to house the archives. On the exterior, one small arched brick lintel in the east wall is the only evidence of the original fenestration. Because of its location within the boundaries of a national historic site, the carriage house is considered to be eligible for listing on the National Register of Historic Places as a contributing element to the site.

THE ESTABLISHMENT OF THE NATIONAL HISTORIC SITE

The Mary McLeod Bethune Council House was designated a national historic site under Public Law 97-329 (96 Stat. 1615), October 15, 1982. This act authorized and directed the secretary of the interior through the National Park Service to enter into agreements with the National Council of Negro Women so that the secretary might provide technical and financial assistance in restoring and interpreting the house museum and associated archives.

Under the provisions of Public Law 102-211 (105 Stat. 1652), December 11, 1991, the National Park Service was authorized to acquire and manage the Mary McLeod Bethune Council House National Historic

Site as part of the national park system. A 15-member Mary McLeod Bethune Council House National Historic Site Advisory Commission (the Federal Advisory Commission) was appointed to participate in an advisory capacity in developing the general management plan. This commission is composed of 15 members appointed for four-year terms. The membership is composed of subject-matter experts and members of organizations that directly relate to Dr. Bethune, including members of the National Council of Negro Women and the Bethune Museum and Archives; experts on the history of African American women, archival management, historic preservation; and three members who represent the general public. Four members of this commission are on the management plan planning team. Members of this commission meet and consult with the planning team on matters relating to the management and development of the national historic site.

The site was acquired by the National Park Service in 1994, and in 1995 staff were hired to manage the site. The site was opened to the public as a national park system site on October 1, 1995. The legislation that authorized the National Park Service to acquire the site also gave the secretary of the interior the authorization to enter into cooperative agreements with organizations aligned with the historic site. The National Park Service currently has a cooperative agreement with the Bethune Museum and Archives, Inc. and the National Council of Negro Women, Inc. The Bethune Museum and Archives and the National Council of Negro Women, Inc. provide public programs on a monthly basis and in return are provided office space, administrative support, storage space, and financial assistance.

PLANNING DIRECTION AND GUIDANCE

Site management is directed by law, policy, and planning documents. Planning for a general management plan begins as the planning team looks at the site purpose(s) and significance and primary interpretive themes. Then they look at the special mandates and the laws and policies that they must also follow before they start preparing a general management plan.

SITE PURPOSES □ WHY THE SITE WAS SET ASIDE

The reasons for which the site was established provide the most fundamental criteria against which the appropriateness of actions proposed in the general management plan are tested.

The following purpose statements represent the National Park Service's interpretation of the legislative mandates that established the site □ the reasons why the site was set aside □ are to

- Interpret the life and legacy of Mary McLeod Bethune.
- Document and interpret the history of African American women and their organizations during the Bethune era, 1875□1955.
- Document and interpret the history of African American women in the struggle for civil rights in the United States.
- Collect and preserve the individual and collective historical records of African American women and their organizations in keeping with the Bethune era and legacy.
- Ensure the preservation, rehabilitation, and maintenance of historic structures and features of the site to the period of most historical significance, 1943□66.
- Preserve the historical furnishings and artifacts relating to Mary McLeod

Bethune and the National Council of Negro Women.

- Administer the site in accordance with the legislation to ensure the site's preservation and interpretation.
- Enter into cooperative agreements with nonprofit groups/organizations as necessary to carry out the mission of the Mary McLeod Bethune Council House National Historic Site.

SITE SIGNIFICANCE □ WHY IT IS SPECIAL AND IMPORTANT

Significance statements define the important attributes that relate to the site's purpose and why the site was established.

Site significance statements capture the essence of the site's importance to the nation's natural and cultural heritage. Understanding the site's significance helps managers set protection priorities and determine desirable visitor experiences. The following significance statements have been developed for the site.

- The Mary McLeod Bethune Council House National Historic Site served as the headquarters of the National Council of Negro Women from 1943□66. Dr. Mary McLeod Bethune, renowned educator, organizer, national political leader, a president of the National Association of Colored Women, and founder and president of the National Council of Negro Women.
- It is at this site that Mary McLeod Bethune achieved her greatest national and international recognition.
- At the Mary McLeod Bethune Council House National Historic Site, the first headquarters of the National Council of

Negro Women, Bethune and the Council spearheaded strategies and developed programs that advanced the interests of African American women and the Black community.

- The site is the location of the National Archives for Black Women's History and archival collections that are dedicated only to the documentation of African American women, their history, and their organizations.

INTERPRETIVE THEMES WHAT VISITORS SHOULD KNOW

"Interpretation" is the word that the National Park Service uses to describe an educational activity that is designed to stimulate curiosity, convey messages to the public, and help the public understand, enjoy, appreciate, and protect the resources. Interpretation includes telling visitors what there is to see and how to get there as well as determining what visitors should learn about the site and how they would best learn that information through media such as an audiovisual program, through a self-guiding brochure, a guided tour, or some other means.

The primary interpretive themes are based on the site's purpose, significance, and primary resources. The primary interpretive themes are the ideas that are so important that every visitor should have the opportunity to understand them.

Although the primary interpretive themes are critical to a visitor's understanding of the site's significance, they are not a list of everything there is to tell about the site. The following themes have been developed by the planning team and the Federal Advisory Commission. These themes narrow the

legislative purpose and focus the efforts of the site staff during the life of the plan.

The *principal interpretive theme* of Mary McLeod Bethune Council House National Historic Site is to commemorate the life, achievements, and legacy of Dr. Bethune. Accordingly, the planning team for the general management plan and the Federal Advisory Commission for the historic site have selected the following history themes to support the site's principal theme:

- personal life
- religion/moral rearmament
- education
- organizations
- World War II activities
- democracy and Americanism
- civil rights
- race relations
- women
- internationalism
- heritage documentation

The themes, according to the planning team and the Federal Advisory Commission, should be divided into four modules:

1. Bethune – the person
2. Bethune – the philosopher (stressing the topical areas of women, education, religion, democracy and Americanism, and internationalism)
3. Bethune – the activist (stressing all eleven topical areas)
4. Bethune – the legacy

SERVICEWIDE LAWS AND POLICIES AND SPECIAL SITE MANDATES AND AGREEMENTS

Some of the future visitor experience and resource conditions at the national historic site are specified by law and policy. For example, the National Park Service does not have the choice to do anything but preserve the council house (a historic structure and a key element of the purpose

for which the site was established). These specified elements include abiding by the large body of laws and policies that are applicable to all national park system units and the site's purpose and significance — as well as any special mandates or commitments that may apply to a particular national park system unit (see below). All decisions made through general management planning must fit within the parameters provided by these laws and policies.

There are also decisions to be made where law, policy, and regulations do not provide clear guidance or limits. For example, do we preserve the council house by limiting the number of visitors, limiting visitors to one floor or two floors or all three floors, not limiting visitors, or excluding visitors? Decisions like these, with more than one possible answer, will be based on the purpose, significance, and the laws and policies mentioned above, as well as the significant resources that are to be protected/preserved, public expectations and concerns, resource analysis, an evaluation of the natural, cultural, and social impacts of alternative courses of action, and consideration of long-term costs. These decisions are the “heart” of a general management plan.

There are often conditions of, for example, visitor use or resource preservation or development of the site, that are specified in the legislation that establishes that particular national park system unit — in this document these conditions are called special mandates or agreements. At this national historic site, for example, one mandate in the legislation was that an advisory commission will participate in an advisory capacity in developing the general management plan.

Service-wide Laws and Policies

General. As with all units of the national park system, management of Mary McLeod Bethune Council House National Historic Site is guided by the 1916 Organic Act that created the National Park Service; the General Authorities Act of 1970, and the act of March 27, 1978, relating to the management of the national park system. Other applicable federal laws and regulations are the Endangered Species Act and the National Historic Preservation Act.

Many resource treatments and some aspects of visitor experience are prescribed by the National Historic Preservation Act of 1966 and the Americans with Disabilities Act, among others, and NPS policy. Although attaining some of these conditions is sometimes deferred due to funding or staffing limitations, the National Park Service will continue to strive to implement these policies with or without a new general management plan. For instance, the general management plan is not needed to decide whether or not it is appropriate to protect historic structures, archeological sites, provide access for visitors with disabilities, or conserve artifacts.

The conditions prescribed by laws, regulations, policies, agreements, and mandates most pertinent to the planning and management of the national historic site are summarized in this section.

The site is to be managed as part of the local (site neighbors) as well as a part of the greater social, economic, and cultural system. Current policy requires the following:

Law or Policy	Management Direction / Action
Uniform Relocation Assistance and Real Property Acquisition Policies Act (PL 91-646)	This act, enacted in 1970 and amended in 1987, provides for uniform and equitable treatment of persons displaced from their homes, businesses, or farms by federal and federally assisted programs and established uniform and equitable land acquisition policies for federal and federally assisted programs. The act ensures that property owners receive fair market value based on an appraisal in addition to most title transfer costs. Displaced owners and tenants receive assistance in finding comparable replacement property and compensation for moving expenses.
NPS <i>Management Policies</i> 3:3	When private land is proposed for acquisition, the National Park Service will make every reasonable effort to reach an agreement with the owner on the purchase price. If an agreement cannot be reached, the National Park Service will take further steps in accordance with authorities and congressional directions that apply to the park in question. Condemnation is generally considered as a last resort. However, acquisition by condemnation may be employed to establish just compensation to clear title, or to prevent damage to park resources when no other means of protection is adequate.
Omnibus Parks and Public Lands Management Act of 1996	<p>Subsection (b) provides the National Park Service with generic authority to make minor boundary adjustments to park units. This subsection amends the Land and Water Conservation Fund Act of 1965 to authorize the secretary of the Department of the Interior to make administrative minor boundary adjustments under the following conditions:</p> <ol style="list-style-type: none"> 1) The area to be added and the area to be deleted must be less than 200 acres and cannot be more than five percent of the total Federal acreage authorized for the unit. 2) The boundary adjustment must not be a major Federal action significantly affecting the quality of the human environment, as determined by the Secretary of the Interior Department. 3) The total appraised value of the area to be added and of the area to be deleted from the unit must not exceed \$750,000. 4) The proposed boundary adjustment may not be an element of a more comprehensive boundary change. 5) The proposed boundary adjustment must be subject to a public review and comment period. 6) The Director of the NPS must obtain written consent from all property owners that would be directly affected by the proposed minor boundary adjustment. 7) Lands to be added under the proposed minor boundary adjustment must be adjacent to lands already administered by the Director of the National Park Service. <p>Subsection (b) also stipulates that minor boundary revisions that involve only deletions of land require an Act of Congress.</p>

Law or Policy	Management Direction / Action
NPS <i>Management Policies</i>	<p>Because the site is an integral part of larger regional environments, the National Park Service will work cooperatively with others to anticipate, avoid, and resolve potential conflicts, to protect site resources, and to address mutual interests in the quality of life for community residents. Regional cooperation will involve federal, state, and local agencies, neighboring landowners, and all other concerned parties.</p> <p>The Park Service will continue to establish and foster partnerships with public and private organizations to achieve the purposes and mission of the site. Partnerships will be sought for resource protection, research, education, and visitor enjoyment purposes.</p> <p>Site staff will keep landowners, land managers, local governments, and the general public informed about site management activities. Periodic consultations will occur with landowners and communities affected by site visitors and management actions.</p> <p>The National Park Service will work closely with local, state, federal agencies, and partners whose programs affect, or are affected by, activities at the site.</p>

Cultural Resources. Current law s and policies require that the follow ing conditions be achieved for historic properties (e.g., buildings, structures, and cultural landscapes) at the site:

Law or Policy	Management Direction / Action
National Historic Preservation Act; Executive Order 11593; Archeological and Historic Preservation Act; the <i>Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation</i> ; Programmatic Memorandum of Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Council of State Historic Preservation Officers (1995); NPS <i>Management Policies</i>	<p>Historic properties are inventoried and their significance and integrity are evaluated under National Register of Historic Places criteria.</p> <p>The qualities that contribute to the eligibility for listing or listing of historic properties on the NRHP are protected in accordance with the <i>Secretary of the Interior's Standards</i>.</p>

Current law s and policies require that the follow ing conditions be achieved at the site to protect and preserve site collections (museum objects and archival collections):

Law or Policy	Management Direction / Action
National Historic Preservation Act; Archeological and Historic Preservation Act; Archeological Resources Protection Act; NPS <i>Standards for NPS Museum Collections Management</i> , NPS <i>Museum Handbook</i> , NPS <i>Records Management Guideline</i> , National Archives and Records Administration Standards, NPS <i>Cultural Resources Management Guideline</i> , and <i>Museum Properties Management Act of 1955</i> .	<p>All museum objects and manuscripts are identified and inventoried, and their significance is determined and documented.</p> <p>The qualities that contribute to the significance of collections are protected in accordance with established standards.</p>

Natural Resources. The few natural resources at the site will not be affected by actions proposed in this management plan; applicable laws and policies for natural resources are unnecessary for this discussion.

Visitor Use and Safety and Accessibility. Current laws and policies require that the following conditions be achieved in national park system units/the national historic site:

Law or Policy	Management Direction / Action
NPS <i>Management Policies</i>	Visitor and employee safety and health are protected.
NPS Organic Act; site's enabling legislation; NPS <i>Management Policies</i>	Visitors understand and appreciate site values and resources and have the information necessary to adapt to site environments; visitors have opportunities to enjoy the sites in ways that leave resources unimpaired for future generations.
NPS Organic Act; site's enabling legislation; Title 36 of the <i>Code of Federal Regulations</i> ; NPS <i>Management Policies</i>	Site recreational uses are promoted and regulated, and basic visitor needs are met in keeping with site purposes. NPS <i>Management Policies</i> prohibit private uses of historic structures.
Americans with Disabilities Act; Architectural Barriers Act; Rehabilitation Act; NPS <i>Management Policies</i>	To the extent feasible, facilities, programs, and services are accessible to and usable by all people, including those with disabilities.
NPS <i>Management Policies</i> ; 1998 Executive Summary to Congress, Recreational Fee Demonstration Program, Progress Report to Congress, Volume I – Overview and Summary (U.S. Department of the Interior, National Park Service, U.S. Fish and Wildlife Service, Bureau of Land Management; U.S. Department of Agriculture, Forest Service)	Visitors who use federal facilities and services for outdoor recreation may be required to pay a greater share of the cost of providing those opportunities than the population as a whole.

Site Mandates and Agreements

Law or Policy	Management Direction / Action
<p>Section 3(b) of Public Law 102-211 (105 Stat. 1652), enacted into law on December 11, 1991, authorized the secretary of the Department of the Interior (through the National Park Service) “to enter into a cooperative agreement with nonprofit organizations dedicated to preserving and interpreting the life and work of Mary McLeod Bethune and the history and contributions of African American women”</p> <p>(A) to provide to the public such programs, seminars, and lectures as are appropriate to interpret the life and work of Mary McLeod Bethune and the history and contributions of African American women, and</p> <p>(B) to administer the archives currently located at the historic site, including providing reasonable access to the archives by scholars and other interested parties.</p>	

Law or Policy	Management Direction / Action
<p>Section 3(2) authorized the secretary “to provide space and administrative support for such nonprofit organization.”</p> <p>Section 3(c) of this act provided that the national historic site “shall be operated and managed in accordance with a General Management Plan.” An advisory commission appointed under terms in specified in Section 4 of the act “shall fully participate in an advisory capacity with the Secretary in the development of the General Management Plan.” The Secretary and the advisory commission “shall meet and consult on matters relating to the management and development of the historic site as often as necessary, but at least semiannually.”</p>	<p>The National Park Service will work toward implementing an approved management plan as directed in the legislation.</p>

CARRYING CAPACITY

The General Authorities Act of 1970 (PL 91-383), as amended in 1978 (PL 95-625), and the National Park Service's *Management Policies* require general management plans to address the issue of visitor carrying capacity. Carrying capacity is a measure used by the National Park Service to ensure that the integrity of its resources is not overly impacted by visitors, and that the quality of the visitor experience is not diminished by overcrowding. The process is accomplished in accordance with the purpose of the site and site management objectives.

The carrying capacity concept assists in managing visitor activities along with natural and cultural resources in a way that is consistent with the site's authorizing legislation. It is useful in helping managers determine the appropriate type and intensity of facilities and activities in specific areas of the site and the number of people to be accommodated to give visitors a quality experience without damaging the resources.

Several additional factors need to be considered for determining carrying capacity: (1) visitors must be able to move from one area to another; (2) sound carries within the council house — one group can inadvertently degrade the experience of another; (3) exhibits and rooms are of limited size, impacting the number of visitors that can

comfortably be accommodated; (4) there is a need for flexibility in providing activities for scheduled groups (e.g., when a program calls for a class to visit the exhibit area, it should be available); (5) it is not always possible to exactly choreograph the movement of groups and other visitors; (6) there will be exhibits and other fixtures that reduce overall space; and (7) circulation corridors can be bottlenecks, especially in the event of emergencies. Furthermore, the limitations of available staff often dictate the numbers of visitors that any particular resource can accommodate at any given time.

The experience of interpreters at the council house is that visitors start complaining about the quality of house tours when the group size goes over 12. Due to noise, only one tour can be on each floor at a time. The circulation from floor to floor is limited to the two staircases, one in the front of the house and one in the back, which further limits the number of tours that can occur simultaneously to two.

Taking these factors into consideration, the visitor experience and circulation become the limiting factors of carrying capacity for the council house. Based on a group size of 15, a 20-minute video followed by a one-hour tour, a staff of two interpreters, and the existing operating hours, it has been determined that the overall carrying capacity

should be about 105 people per day in the council house.

Researchers at the carriage house require desk and study space. The existing layout allows space for two moderately sized workstations and, therefore, two researchers at a time.

Figures for both the council house and carriage house might require adjustment as experience accumulates.

PLANNING ISSUES

Many issues and concerns have been identified by NPS staff, the Federal Advisory Commission, and the general public as part of the scoping (initial planning efforts) for this general management plan. Comments were solicited at public meetings, through planning newsletters, and on the Internet. For more information on the comments received, see the "Consultation and Coordination" section. Following is the list of issues from these scoping sessions:

- Most of the site's visitors are school groups, commercial tour groups, or heritage tour groups that arrive by bus. The visitor reception area is the only space that can serve as an orientation area. The house does not easily accommodate large groups.
- The council house — which provides space for all visitor orientation and interpretation, a cooperative association bookstore, most administrative offices, and developing interpretive programs — is inadequate for these purposes.
- The carriage house — which provides space for researchers, a small reference library, some administrative offices, archival storage, and work areas for processing archival collections — is inadequate for these purposes.
- Neither structure accommodates visitors with disabilities. The council house and the carriage house cannot accommodate additional staff, but all functions on the site require more staff to operate adequately.
- The single-toilet restroom on the second floor of the council house is not accessible

to visitors with disabilities and does not meet the needs of groups.

- The room arrangement in the council house is not conducive to a high-quality visitor experience. The current mix of administrative functions and visitor services does not allow efficient site operations or use of space or flexibility. More space is needed for administrative offices.
- The archival collections in the carriage house are catalogued and processed, but the entire collections exceed the archival storage space; part of the collections are stored offsite in leased space. More collections are expected. Although some climate control equipment has been installed, the carriage house has no dehumidifier, vapor barrier, or fire sprinkler system, and the insulation is inadequate. Therefore the structure does not meet current archival standards.
- The current computer, communication, and Internet systems need updating.
- There is inadequate room to provide to the public such programs, seminars, and lectures as are appropriate to interpret the life and work of Mary McLeod Bethune and the history and contributions of African American women.
- The interpretive program is not as comprehensive as it should be.
- Interpretation is not provided for visitors with disabilities, either directly or by providing other methods of interpretation.
- Interpretation of the archival materials in the current exhibits is lacking.
- Parking for both visitors and park staff is limited to on-street parking in a high demand urban area.
- Links to and partnerships with related sites interpreting the history and education of African American women have not yet been established.
- Because of the space, staff, and budget limitations, and the continuing conflicts between administrative and visitor functions, the approach to managing the site, archives, and educational programs is more reactive, and NPS managers would like it to be proactive.
- Many people in the Washington, D.C. area and beyond are not aware of the

establishment of the national historic site. Consequently, potential visitors are not experiencing the stories and educational values the site offers.

- There is no overall plan to balance the many needs.

RESOURCES AND/OR VALUES AT STAKE IN THE PLANNING PROCESS □ IMPACT TOPICS

This document is a general management plan / environmental impact statement. The general management plan is integrated with environmental consequences. In the “Environmental Consequences” section, the impacts (affects) of implementing the proposed general management plan and the alternatives are analyzed. Laws and policies, and sometimes public input, also set parameters for what impact topics need to be analyzed. However, applicable topics can and do vary for the various places administered by the National Park Service. For instance, the National Park Service is required to avoid, to the extent possible, the adverse impacts associated with the destruction or modification of wetlands. At a site like the council house, where there are no wetlands, this impact topic (impacts on wetlands) can be dismissed. In other words, to focus analysis of the potential impacts of implementing the alternatives, specific impact topics were selected for further analysis and others were eliminated from further evaluation. Relevant impact topics were selected based on agency and public concerns, regulatory and planning requirements, and known resource issues.

Subsequent discussions of the environment that would be affected (in the “Affected Environment” section) and the environmental impacts related to each alternative (in the “Environmental Consequences” section) focus primarily on these impact topics. A brief rationale for the selection of each topic is given below, as well as the

rationale for dismissing specific topics from further consideration.

IMPACT TOPICS SELECTED FOR FURTHER ANALYSIS

Impact topics selected for further analysis are cultural resources, visitor use, socioeconomic environment, and national historic site administration and operations. These topics are described in the subsequent “Affected Environment” section and analyzed in the “Environmental Consequences” section.

Cultural Resources

The preferred alternative and other alternatives have the potential for effects, primarily beneficial, on cultural resources. These include effects on the historic structures, furnishings, district, and landscape and the archival collections. Alternatives 3 and 4 involve rehabilitation or demolition of the carriage house, and the effects of these actions will be analyzed further.

Visitor Use

The alternatives would directly affect visitor experience and how visitors use the site. The impact topics affecting visitor use are the amount of facility space, number of staff, amount of crowding, accessibility, and opportunity to learn the stories.

Socioeconomic Environment

The potential impact of the alternatives on the socioeconomic environment is a consideration requiring analysis for this project. Impact topics include the local economy and population, land use, and visual quality, transportation and site access, and environmental justice.

Site Administration and Operations

The alternatives would directly affect administration and operations of the national historic site. Topics include adequate space, staff parking, number of staff, and staff efficiency.

IMPACT TOPICS ELIMINATED FROM FURTHER EVALUATION

The impact topics eliminated from further evaluation are briefly discussed below and will not be analyzed in detail in this document. Most of these topics relate to natural resources, because there are almost no natural resources at the site.

Air Quality

The 1970 Clean Air Act requires federal land managers to protect air quality, while the NPS *Management Policies* address the need to analyze air quality during site planning. The standards are levels of air quality necessary to protect public health and prevent any degradation or harm to the total environment.

The entire Washington, D.C., metropolitan area and adjacent counties in Virginia and Maryland are classified as nonattainment for the ozone national ambient air quality standard. Ozone, a secondary pollutant, is formed when vehicular emissions (volatile organic hydrocarbons and nitrogen oxides) combine with sunlight as a catalyst. Exceeding the standard generally occurs in the summer and is regionwide rather than localized. The area is in compliance with all other standards for pollutants. The implementation of any of the alternatives would not be expected to result in a sufficient amount of vehicular traffic to raise the level of ozone and further exceed the attainment standard. Any increases in vehicle emissions would have negligible effects on local air quality.

Removing the carriage house and constructing a new building behind the council house would potentially result in an increase in fugitive dust from soil exposure and disturbance. However, this effect would occur only during the construction period and would be localized. Water or dust control agents would be applied during construction as necessary to control dust. No long-term impacts on air quality from facility operation would be anticipated.

Water Resources/Floodplains/Wetlands

There are no intermittent or perennial streams within or adjacent to the project area. The implementation of any of the alternatives would not be anticipated to noticeably add to local water and wastewater treatment requirements. Therefore, impacts on the system's capacity and the area's water quality would be negligible.

Executive Order 11988 ("Floodplain Management") requires an examination of impacts on floodplains and of the potential risk involved in having facilities within floodplains. According to the Federal Emergency Management Agency, the project area is not within either a 100-year or 500-year floodplain but is in a zone of "minimal flooding." The nearest designated floodplain is associated with Rock Creek, which is more than a mile northwest of the national historic site and includes a 100-year floodplain.

Executive Order 11990 requires federal agencies to avoid impacts on wetlands where possible. Wetlands are identified on the U.S. Fish and Wildlife Service's *National Wetland Inventory* map for the Washington D.C./Maryland area. The map indicates the nearest delineated wetlands are primarily within the banks of Rock Creek, more than a mile northwest of the national historic site. There would be no impacts on floodplains or wetlands anticipated from implementing any of the alternatives.

Soils

Under alternative 4, construction of a building in the courtyard area behind the council house would disturb those soils. Those soils are in an urban, developed area and have been previously disturbed. Best management practices for erosion control would be implemented during construction.

Vegetation and Wildlife

The National Environmental Policy Act requires the impacts of federal actions on components of affected ecosystems to be examined. NPS policy is to protect the abundance and diversity of natural resources. The project area is situated in a highly developed urban setting that has been cleared of natural vegetation. Vegetation and wildlife species in the area are those associated with disturbed areas and human development in large metropolitan areas. Disturbance related to construction work in alternatives 3 or 4 would occur on less than one acre of previously disturbed ground and would not affect natural wildlife habitat. Therefore, no appreciable impacts on vegetation or wildlife are expected.

Threatened or Endangered Species or Species of Special Concern

The Endangered Species Act requires an examination of impacts of federal actions on federally threatened or endangered species. The project area is comprised exclusively of disturbed habitats in an urban environment. The U.S. Fish and Wildlife Service was contacted in June 2000 to provide information about the potential occurrence of species that are threatened, endangered, or of special concern in the D.C. vicinity. Except for occasional transient individuals, no federally listed threatened or endangered species are known to exist in the project area (see appendix B).

Hazardous Materials

A hazardous materials inventory (level 1) was conducted for the National Park Service in October 1992 to identify potential hazards. The inventory included data collection and record searches regarding past and current land uses and materials handling to identify potential sources of hazardous materials. The survey determined there are no known potentially hazardous materials sources at locations near the council house.

An onsite reconnaissance survey included testing two samples of insulation for asbestos. There were no asbestos-containing materials observed in the samples.

A survey of surfaces that may contain lead-based paints or solders was conducted at the council house and carriage house. Grained wood surfaces on the first floor and plaster surfaces were not tested because many of these surfaces are new since the fire in the 1960s or from rehabilitation work in the 1980s. Test results revealed lead paint on historic wood surfaces, trim, and windows throughout the house, and water supply pipes contain lead solder. No lead paint was detected on the window jams or sills on the southeast façade of the house or in the carriage house.

The surveyor recommended replacing water lines in the future and to use bottled water in the interim. Lead paint found on surfaces within the house should not be a health threat to employees. However, when windows on the front of the building are repaired or trim work is stripped and repainted, appropriate precautions should be taken when performing the work to protect the health of painters and office workers.

The NPS Office of Lands, Resources, and Planning personnel recommend further testing for asbestos and lead paint if

rehabilitation or construction work is performed at the site.

Because the building selected for additional interpretive and administrative space in alternative 2 is privately owned and has not been evaluated for hazardous materials, and because the buildings for additional interpretive and administrative space in alternatives 3 and 4 have not been selected, the potential for site-specific hazardous materials is unknown. It is the policy of the Department of the Interior (Secretary's Order 3127) and the National Park Service that a determination of the presence or absence of hazardous materials be made before real estate is acquired. Any hazardous materials on a site must be remediated before the site is accepted for acquisition or lease. Written certification of the absence of hazardous materials would

be required. Consequently it can be assumed that there would not be sufficient hazardous materials at the site to pose a threat to the health of visitors or staff under any alternative.

ISSUES BEYOND THE SCOPE OF THIS PLAN

Many ideas about the national historic site from staff, the public, and the Federal Advisory Commission were generated as a result of the planning/scoping process and responses to the newsletters. Some of these ideas are beyond the scope of this general plan. We will explore these ideas further as we prepare more detailed plans and designs to implement this plan.

RELATIONSHIP TO THE NEIGHBORHOOD, RELATED SITES, AND OTHER PLANNING EFFORTS

RELATIONSHIP TO NEIGHBORHOOD

At the time of construction, the neighborhood of the council house was a fashionable residential area. Today, the neighborhood of the council house is a mix of residences, commercial buildings, and public facilities. Some row houses and other large single-family homes in the immediate vicinity have been converted to apartments or condominiums. Older structures are being rehabilitated, and vacant lots are being developed for new housing units. Small commercial enterprises, such as restaurants, retail, and service businesses, are behind the council house. Mt. Olivet Lutheran Church is a few structures away. Beyond the immediate neighborhood of the council house, land use includes an upscale commercial area with hotels, restaurants, and high-rise office buildings.

The council house has been on a historic house tour conducted in the neighborhood during the holiday season. The maintenance staff conducts an autumn leaf pick-up for the residences on the block.

RELATED SITES IN WASHINGTON, D.C.

Logan Circle Historic District

The Mary McLeod Bethune Council House National Historic Site is a contributing resource to the Logan Circle Historic District, listed on the National Register of Historic Places on June 30, 1972, because of its architectural significance.

The approximately eight-block Logan Circle Historic District is a unique, virtually unchanged example of a prosperous, late-19th-

century residential neighborhood constructed around a large open urban space. The focal point of the district is Logan Circle, an important element of the 1791-92 L'Enfant Plan and Ellicott Plans for the Federal City. Impressive three- and four-story townhouses, closely grouped, surround the circle and some of the radial streets. Nearly all were constructed between 1875 and 1900 and present an almost solid street façade of Late Victorian and Richardsonian architecture.

One of the most significant distinctions of the Logan Circle Historic District is the way in which the buildings, individually and in groups, occupy the irregularly shaped lots and frontages created by the non-grid pattern of the streets. Despite variations of style, detail, and individual excellence, it is the unity of materials, scale, and period character that make this group of buildings a distinct and significant historic district.

At first, the Logan Circle area was a fashionable residential area for prominent white businessmen and statesmen, but by the mid-1890s the wealthy were beginning to build their mansions further west toward Dupont Circle. By the 1940s, the buildings in the Logan Circle area were the homes of prominent African American political, professional, and social figures. With time, those residents moved elsewhere, and the once grand homes deteriorated. In recent years, restoration and preservation efforts have revitalized the area.

Lincoln Park

A 12-foot bronze statue of Mary McLeod Bethune, sculpted by Robert Berks and



Bethune Memorial, Lincoln Park, Washington, D.C. NPS photo.

erected with funds raised by the National Council of Negro Women, graces Lincoln Park (on East Capitol Street between 11th and 13th Streets, NE. Dedicated in 1974 on the 99th anniversary of Dr. Bethune's birth, the statue, which was the first monument in a District of Columbia park to honor an African American woman, is inscribed with the educator's famous "Legacy" — words she wrote that set forth the meaning of her life and hopes for her people. With her trademark cane, the energetic teacher reaches out to two children as if handing on her legacy of self-respect, pride, and a love of learning.

In 1876 a statue of Abraham Lincoln, called Freedom's Memorial, was unveiled in Lincoln Park in honor of the Great Emancipator. Sculpted by Thomas Ball, the statue, paid for solely with funds donated by

freed slaves, depicted Lincoln with the Emancipation Proclamation in one hand and the other hand extended toward an African American man breaking out of shackles. In 1974 the Lincoln statue, which originally faced the Capitol, was turned to face the Bethune memorial in this landscaped setting that is maintained by the National Park Service.

Moorland-Spingarn Research Center

The center, on the campus of Howard University in Washington, D.C., is recognized as one of the largest and most comprehensive repositories for the documentation of the history and culture of people of African descent in Africa, the Americas, and other parts of the world.

Washington, D.C., Black History National Recreation Trail

Dedicated during Black History Month, February 1988, the Washington, D.C., Black History National Recreation Trail has been designated as part of the national trails system by the secretary of the interior. The purpose of the trail is to interpret the vitality, contributions, and progress of Washington's African American community for nearly 200 years. Rather than following a specific route, this trail directs visitors to magnet sites in historic neighborhoods that illustrate aspects of African American history from slavery days to the New Deal. Sites on the trail include the following:

Mt. Zion Cemetery/Female Union Band Cemetery, behind 2515-2531 Q Street, NW, Georgetown

Metropolitan A.M.E. Church, 1518 M Street, NW, downtown

Lincoln Park, East Capitol Street between 11th and 13th Streets, NE, Capitol Hill

Frederick Douglass National Historic Site, 1411 W. Street, SE, Anacostia

Howard University, 2400 6th Street, NW, LeDroit Park

Mary McLeod Bethune Council House National Historic Site, 1318 Vermont Avenue, NW, Logan Circle

Carter G. Woodson Home (a designated national historic landmark), 1538 Ninth Street, NW, downtown (not open to the public)

Also, Mary McLeod Bethune National Historic Site is one of the sites on the self-guided Dupont-Kalorama Museum walk.

RELATIONSHIP TO OTHER PLANNING EFFORTS IN WASHINGTON, D.C.

Various plans for Washington, D.C., or for specific aspects of the city are in progress or are already guiding the outcome of other planning initiatives, including the alternatives considered in this document. The major elements of these plans, as they relate to this general management plan, are discussed below. The alternatives in this document are generally in concurrence with the goals and objectives of these plans.

The 1984 *Comprehensive Plan for the National Capital* is comprised of a series of elements, or policies, that have been adopted by the District of Columbia government, the Council of the District of Columbia, and the National Capital Planning Commission to guide the district's long-term development. The plan includes both District of Columbia elements (adopted by the D.C. government) and federal elements (adopted by the National Capital Planning Commission). The elements most relevant to this general management plan are listed below.

District of Columbia Elements

Economic Development

Support the enhancement of visitor services in downtown near the monumental core, including the traditional forms of service and information on recreation, hotels, restaurants, nightclubs, historic resources, and shopping facilities in downtown and other special areas of the district.

Preservation and Historic Features

Every effort should be made to provide for continued, appropriate use of all historic properties.

Publicly owned historic landscapes and historic open spaces should be protected from unrelated and unnecessary construction that would adversely affect their integrity.

Federal Elements

General Policies

All major federal facilities in the region should have a master plan to guide their long-range development consistent with the *Comprehensive Plan* to promote effective use of federal property.

Federal Parking Policies

Parking at federal facilities for federal employees and visitors should be provided and managed at a level that maximizes the use of public transportation and high-occupancy vehicles.

Visitors to the National Capital

Prepare and provide specialized information, learning aids, and tours for specific groups visiting federal attractions, such as handicapped persons, senior citizens, school-children, and foreign visitors to accommodate their special needs.

Visitor Programs and Special Events

Program festival, parades, concerts, performing and fine arts presentations, and other seasonal events throughout the year. The Independence Day celebration, Folklife Festival, military band concerts, Pageant of Peace, and Cherry Blossom Parade are examples of such special events programming.

Preservation and Historic Features

The policies identified in the federal plan are identical to those outlined for the District of Columbia element.

RELATED SITES OUTSIDE WASHINGTON, D.C.

Bethune-Cookman College

Founded by Bethune, the college is a historically African American, United Methodist Church-related, liberal arts coeducational institution in Daytona Beach, Florida. The college archive in the school's library contains the works and papers of Bethune. Bethune's home, which was designated a national historic landmark in 1974, is on the campus.

Schomburg Center for Research in Black Culture

The research center, one of the research libraries associated with the New York Public Library, houses art, artifacts, manuscript and archival collections, rare books, motion pictures, other audiovisual materials, and photographs relating to African American culture in the United States and other parts of the world.

Schlesinger Library

On the Radcliffe College campus in Cambridge, Massachusetts, the library holds letters, diaries, photographs, books, periodicals, oral histories, and audiovisual materials that document the history of women, families, and organizations, primarily in the 19th and 20th centuries. These materials include information on African American women, families, and organizations.

University of Texas

The Special Collections and Archives Department at the University of Texas, San Antonio, has gathered significant collections relating to women's history through its

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Archives for Research on Women and Gender Project.

Amistad Research Center

The center, on the Tulane University campus in New Orleans, Louisiana, is among the largest of the nation's repositories specializing in the history of African Americans. Papers of African Americans and records of organizations and institutions of the African American

community make up about 90% of the center's holdings.

Duke University

The Duke University Library in Durham, North Carolina, houses significant archival collections relating to the African American experience in the Americas and other parts of the world.

**ALTERNATIVES, INCLUDING THE PREFERRED
ALTERNATIVE**

INTRODUCTION

THE ALTERNATIVES

In this section a proposed future direction for Mary McLeod Bethune Council House National Historic Site (alternative 2, the preferred alternative) is described along with three other alternatives. Before the alternatives were developed, information on site resources, visitor use, and visitor preferences was gathered and analyzed. Information was solicited about the issues and the scope of the project from the public, government agencies, and special interest groups through newsletters, meetings, and personal contacts. Based on the site's purpose and significance and public comments, the planning team identified the resource conditions desired and a range of appropriate visitor experiences or opportunities for the site. The development of three preliminary concepts (alternatives 2-4) for the site's future was the result.

Each of the three concepts was intended to support the site's purpose and significance, address issues, avoid unacceptable resource impacts, respond to public wishes and concerns, and meet the site's long-term goals. An evaluation process, called "Choosing by Advantages," was used to evaluate and compare the alternatives and to develop a preliminary preferred alternative. To assess both costs and impacts of

the proposed changes, necessary functions, and possible locations for those functions are discussed.

Alternative 1, the no-action alternative, describes the continuation of current management and trends; it serves as a basis for comparing the other alternatives. Alternative 2 provides for management of the historic site emphasizing both its museum and archives functions to comprehensively interpret the life, contributions, and legacy of Mary McLeod Bethune. Alternative 3 commemorates the legacy of Bethune by establishing the Bethune Center for Human Rights and using the council house as a base for stimulating social change. Alternative 4 commemorates the life and times of Bethune by managing the council house as a traditional house museum.

ALTERNATIVES OR ACTIONS CONSIDERED BUT ELIMINATED FROM FURTHER STUDY

There were no alternatives considered but eliminated from further study. All the concepts for the alternatives remained unchanged. However, some of the specific actions within the alternatives changed during the course of the planning process.

ALTERNATIVE 1: NO ACTION

OVERALL CONCEPT

Current operations, with limited space, staff, and budget, would continue at the site. No additional property would be acquired or leased. Visitor facilities would continue to be inadequate, and facilities would remain inaccessible to visitors and employees with mobility disabilities. The second-floor, single-toilet restroom would continue to be used for visitors, including those arriving in groups. The limited administrative and visitor orientation functions would remain in the council house, and the archives would remain in the carriage house. Although the archival collections have been professionally stored and shelved, without additional funding the building would not provide the physical environment for professional curatorial standards and would not have room for storage of the additional collections expected.

Cooperative agreements with the Bethune Museum and Archives, Inc. and the National Council of Negro Women would continue.

The interpretive program, which focuses on Dr. Bethune, the council house, and the National Council of Negro Women, would continue to be less comprehensive than is desired. Space for researchers and their work would continue to be inadequate. The council house would continue to be preserved as funding permits and in response to structural deterioration, without a more proactive preservation plan. See the Alternative 1 □ No Action map.

To achieve desired future condition:

- Seek funding to get archival storage space up to standard with humidity control and fire protection.

Staffing would continue as follows:

1 site manager
2 site rangers

1 archivist
1 maintenance worker
1 secretary

COUNCIL HOUSE

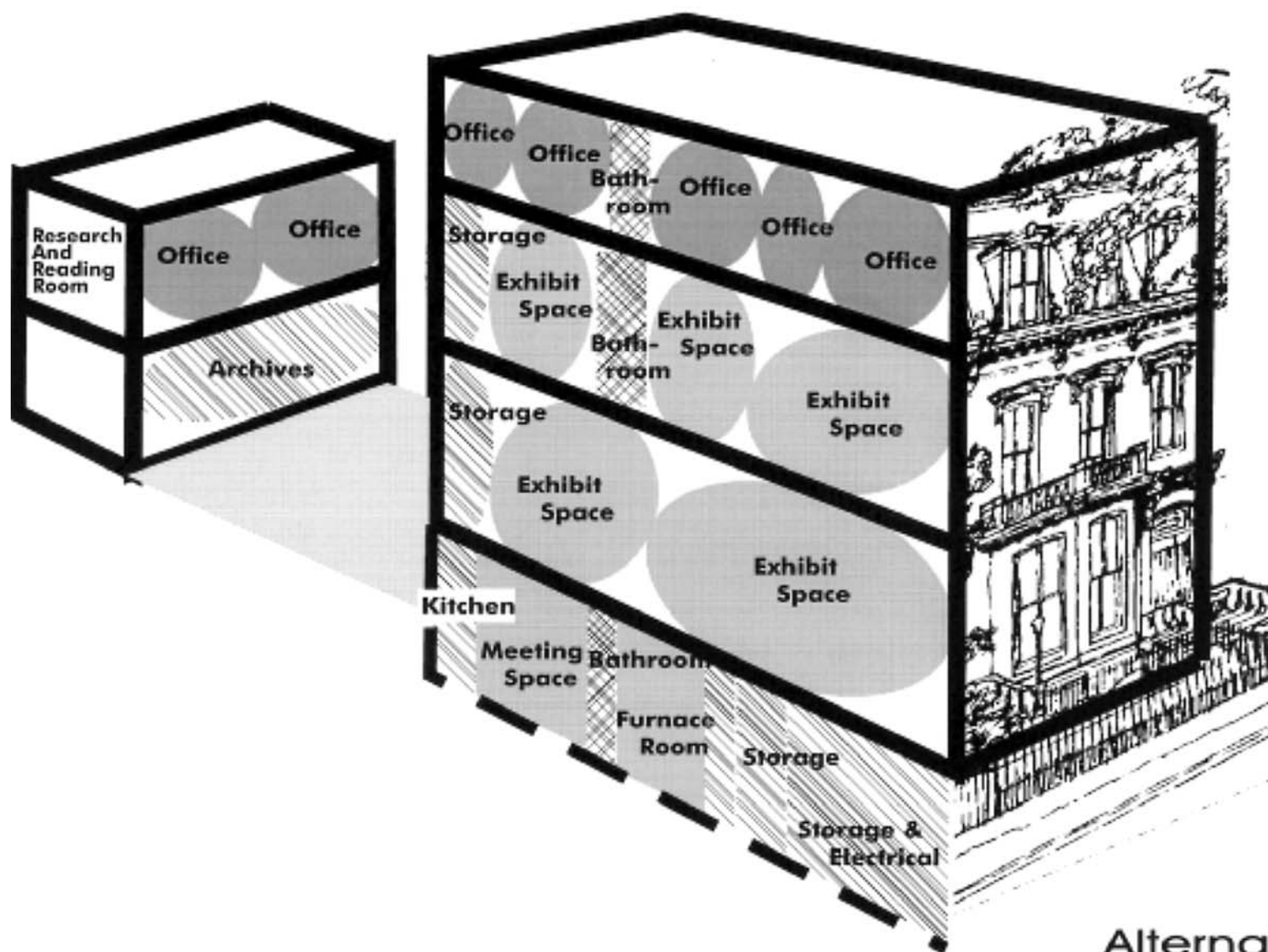
The council house would continue to provide multiple functions as a visitor center and administrative area. The visitor orientation/video area and bookstore would remain in the house. Ranger-led and self-guided tours would continue to be available. A mix of mostly permanent exhibits about the council house, Bethune, and the National Council of Negro Women, and some temporary exhibits relating to African American women's history would continue to be provided. Special programs, exhibits, and events would continue. Offsite programs would continue when requested, with traveling exhibits and staff visiting schools and community groups. Interpretive stories would continue to focus on two themes: Bethune the person and Bethune the philosopher. The house and visitor restrooms would remain inaccessible to visitors with mobility disabilities.

CARRIAGE HOUSE

The carriage house would remain the storage space for the archival collections with space for research and archival staff offices. Due to the building's structural considerations, the rolling shelves would remain on the first floor. Offices and the small reference area/work space would remain upstairs, continuing to be inaccessible to visitors or staff with mobility disabilities.

NEW INTERPRETIVE, ADMINISTRATIVE, OR ARCHIVAL SPACE

No new space would be leased or acquired.



Alternative 1 No-Action

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ALTERNATIVE 2: DUAL EMPHASIS ON MUSEUM AND ARCHIVES (PREFERRED ALTERNATIVE)

OVERALL CONCEPT

In this alternative the national historic site would place a dual emphasis on the council house, which would be used as a museum, and on the archives. Both the museum and the archives would be expanded and linked by using the archival materials in changing interpretive exhibits and programs. The interpretation would provide a broad and balanced program and more in-depth treatment of Dr. Bethune's role as a public figure and organizer. Dr. Bethune's vision of an expansive archival collection of African American women's history would be achieved. The archives would become a significant, state-of-the-art research institution and a modern repository that meets current professional archival management standards. Archival research would be concentrated onsite. Research capabilities and services would be improved through the use of advanced technology. Archival collections and processing would also be onsite. When necessary, archival collections would be moved to the Museum Resource Center for preservation and storage.

Partnerships would be sought to provide assistance with archival acquisition, preservation, and research. Additional partnerships with both NPS and non-NPS groups should be sought to link with other related sites. NPS staff would work with the District of Columbia to add the site on local (e.g., bus and shuttle) transportation routes and improve directional signs to the site.

Additional acquired property for offices and visitor orientation and an increase in staff would be a necessity for implementing this alternative (see Alternative 2 – Dual Emphasis map).

To achieve desired future condition:

Improve visitor experience.

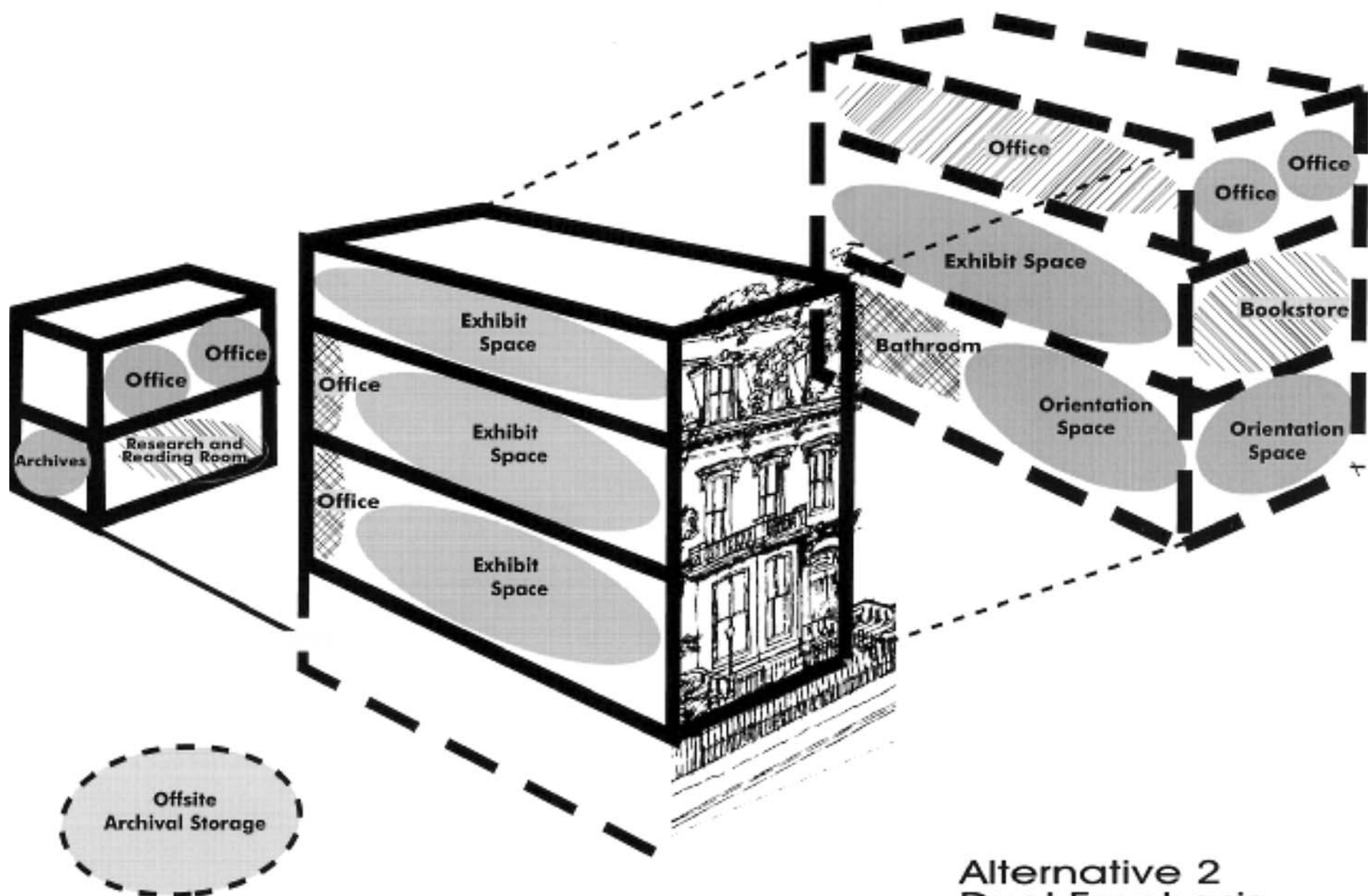
- Provide adequate space for orienting groups.
- Increase number and scope of exhibits.
- Create changing exhibits.
- Provide accessibility.
- Work with local businesses and organizations to provide a shared parking area; include parking area information on the site's Web site.
- Provide multimedia and educational resources to both expand the visitor experience (across the globe) and provide additional access to a physically limited space, possibly through the World Wide Web, compact discs, DVDs, and onsite terminals.

Upgrade archival facility and services.

- Improve new archival collection area to meet archival standards.
- Provide space for growth of collections.
- Upgrade ways for people to learn about the collections, and develop new tools for disseminating information on the holdings, including computer systems and enhanced and interactive Internet access.
- Provide more space for researchers and staff.

Enhance educational and interpretive outreach programs (scholars, schools, teachers, and community groups).

- Make educational programs broad in scope but comprehensive.
- Use furnishings from the Bethune era as permanent exhibits in the council house.
- Focus future archival acquisitions on Mary McLeod Bethune, civil rights, the National Council of Negro Women, the National Association of Colored Women, and other significant African American women and organizations associated with the Bethune era.



Alternative 2 Duel Emphasis

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DSC/DEC 00/021/20.004

- Include educational programs and electronic media in interpretive programs.
- Provide state of the art outreach and virtual programs for a broad range of the public.
- Ensure that oral histories are done.
- Increase staff to 13 to accommodate expanded visitor, educational, and archival services. Additional staff members would be as follows:

- 1 assistant site manager
- 1 site ranger
- 1 visitor use assistant
- 1 museum educator/curator
- 1 archivist
- 1 archival technician
- 1 maintenance worker

Knowledge of African American women's history and web/educational technology skills would be a part of the additional staff skills that the Park Service would be seeking.

The proposed desired future conditions would require additional space. Where and how much space is required would have impacts on the visitor experience, resources, and operational efficiency of the national historic site.

COUNCIL HOUSE

Functions within the council house would be simplified to eliminate conflicts between administrative tasks and visitor experiences. Administrative offices, except for those required by interpretive rangers on site, would be moved out of the council house. Orientation, the video/lecture area, restrooms, and bookstore would be moved to a new location adjacent to the council house. The council house would be used for interpretation, and interpretation would be provided via ranger-guided tours and self-guided exhibits. Exhibits would include a balance between permanent and changing

material, with new material coming from the archival collections. Stories presented in the exhibits would be broad and comprehensive, relating to all four interpretive themes (Bethune the person, Bethune the activist, Bethune the philosopher, and Bethune, the legacy) as well as the contributions and accomplishments of Dr. Bethune and her life and times. The exhibit areas would feature multimedia and interactive venues.

CARRIAGE HOUSE

The carriage house would be renovated and adaptively reused. The house would remain the administrative center and researchers' point of contact for the National Archives for Black Women's History. A research room would be located in the house, providing a state-of-the-art area for visiting researchers. Space would also be provided for the expanded archival staff. Select archival collections and collections frequently accessed would be in the carriage house. Three parking spaces would be available in the alley for administrative use.

NEW INTERPRETIVE, ADMINISTRATIVE, OR ARCHIVAL SPACE

New space is proposed to be acquired by the purchase and rehabilitation of the adjacent row house. The new space would accommodate orientation, bookstore, accessible restrooms, and administrative offices. Access for mobility disabled visitors would be provided through a front entrance. An elevator would be added to provide access to all three visitor floors of the council house and administrative functions in the new space. Access between the buildings would be required. The National Park Service would seek congressional approval to expand the boundary.

If purchase and rehabilitation of the adjacent property is not feasible, then purchase and rehabilitation of a nearby

*Alternative 2: Dual Emphasis on Museum and
Archives (Preferred Alternative)*

property would be considered and programmatic interpretation would be provided.

Interpretive methods would be used to both expand the visitor experience and preserve the cultural resources. This new space would include multimedia and educational resources and help provide additional access to a physically limited space.

Delivery could be over the World Wide Web, through compact disks, DVDs, or other media, and at onsite terminals.

Archival processing would be onsite. The collections would also be onsite as space allows. When necessary, the collections would be moved to the Museum Resource Center, an existing state-of-the-art storage facility.

ALTERNATIVE 3: EMPHASIS ON ACTIVITIES AND PROGRAMS

OVERALL CONCEPT

The national historic site would commemorate Mary McLeod Bethune through the establishment of the Bethune Center for Human Rights. The center would continue Dr. Bethune's legacy by using the council house as a base for stimulating social change. While retaining the archival resources, interpretation of African American women's history, and the house as a museum, the site would provide the place for community and activist groups to meet and engage in activities, workshops, and programs. Interpretive themes would emphasize Bethune, the legacy. Groups using the facilities would include those with whom Dr. Bethune and the National Council of Negro Women worked, as well as other organizations that would encourage social change in accord with Dr. Bethune's ideals. Lectures and receptions for educational and activist groups would take place, with emphasis on literacy and voices of the civil rights and human rights movement.

The center would seek partnerships with educational and social action groups to sponsor exhibits and educate people of all ages regarding Dr. Bethune's activities on behalf of interracial cooperation and social justice. Archival collections also would emphasize materials related to social justice and human rights.

Leased or acquired property (see Alternative 3 – Emphasis on Activities and Programs map) and an increase in staff would be a necessity for implementing this alternative.

To achieve desired future condition:

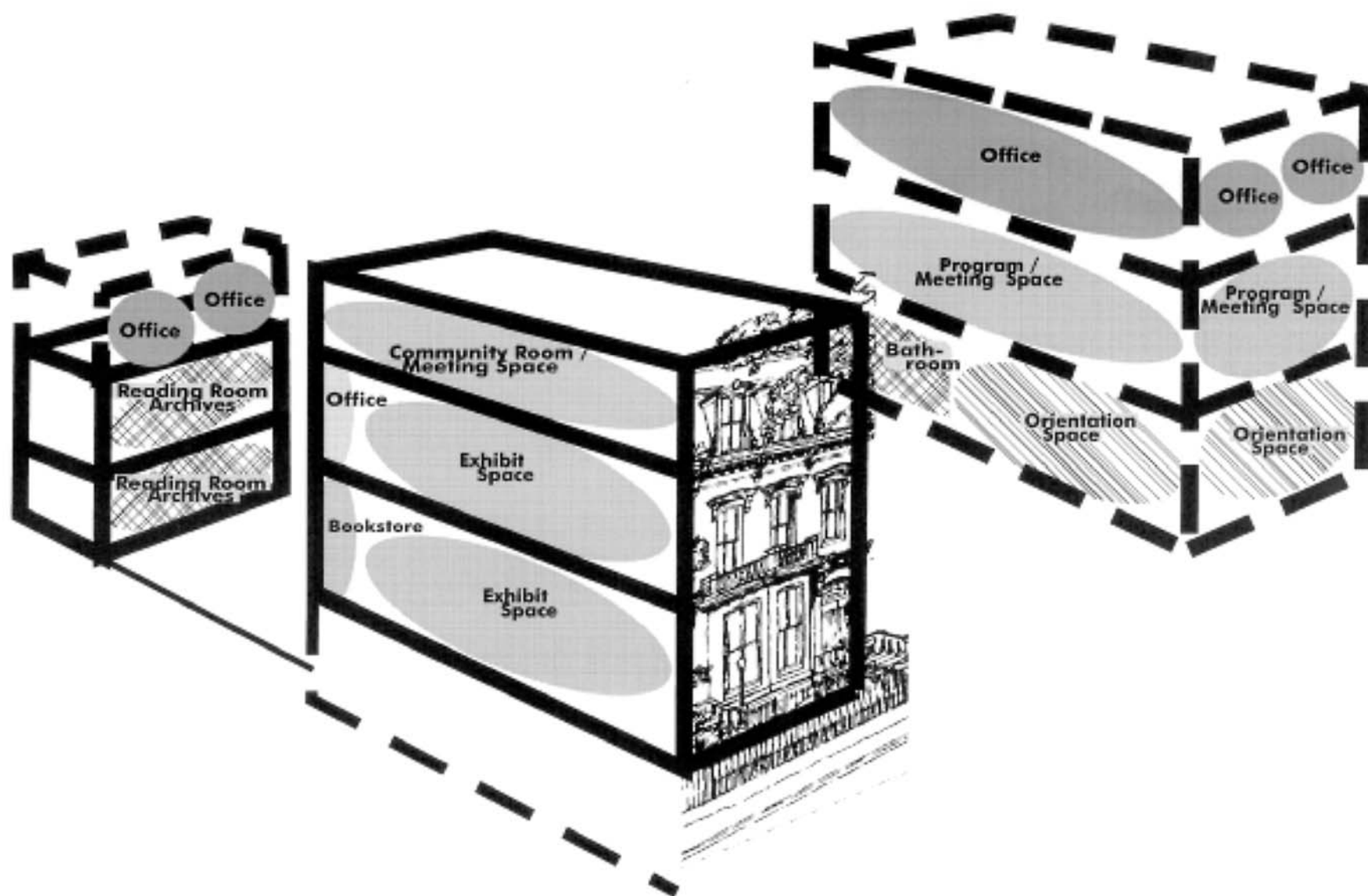
- Provide meeting space for large and small groups.

- Increase the number of exhibits and provide proportionally more changing exhibits.
- Direct future archival acquisitions to include materials relating to civil rights, human rights, and activism.
- Greatly expand outreach programs to schools, community groups, and teachers.
- Sponsor lectures, workshops, conferences, and receptions on subjects of or for promoting social change, human rights, and activism.
- Provide space for the growth of the archival collections.
- Increase staff up to 14 and orient disciplines toward organizational and coordination needs. Additional staff members would be as follows:

1 assistant site manager
2 site rangers
1 visitor use assistant
1 education specialist
1 program coordinator
1 secretary
1 maintenance worker

COUNCIL HOUSE

In alternative 3, the council house would function as a place for interpretation and, as it was historically, for meetings. There would continue to be self-guided tours in the house, and offsite interpretation, including traveling exhibits, would be expanded. Ranger-led tours would be less than currently available. Galleries in the council house would contain both permanent and semipermanent exhibits, but the emphasis would be on changing exhibits that would focus on current issues. Exhibit topics would include Dr. Bethune and civil rights, post Bethune civil rights, activism, the civil rights movement and the reasons for it, and passing on Dr. Bethune's goals and ideals.



Alternative 3 Emphasis on Activities and Programs

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A curriculum for grades K-12 would be developed. Offsite interpretation could include an interactive Web site or chat room. Interpretation and office functions would be divided between the council house and an additional new space.

CARRIAGE HOUSE

The carriage house would be renovated and expanded to include the archival collections, archival staff offices, and research space. The space for storage would be increased and brought up to modern professional archival standards. Some space for onsite researchers would be provided, but more service would be provided and enhanced through technological improvements.

NEW INTERPRETIVE, ADMINISTRATIVE, OR ARCHIVAL SPACE

Orientation space for visitors, administrative offices, and the primary space for

meeting rooms and workshops for groups would be provided in new leased or purchased space near the council house (see Alternative 3 – Emphasis on Activities and Programs map). This space would be the primary contact point for visitors. After orientation, visitors would be encouraged to visit the council house. Interpretive stories would focus on three themes: Bethune the person, Bethune the activist, and Bethune the legacy. The stories would be told through media, such as videos and exhibits, and interpreters. The space would accommodate mobility impaired visitors with programmatic interpretation and accessible restrooms. An expanded administrative staff would also be in this location. Exact location and lease or acquisition would be determined in future studies based on cost and availability. If space were purchased, the National Park Service would seek congressional approval to expand the boundary.

If space is leased nearby, parking space might be available for visitors.

ALTERNATIVE 4: EMPHASIS ON MUSEUM OPERATIONS

OVERALL CONCEPT

The national historic site would commemorate the life and times of Mary McLeod Bethune by managing the council house as a traditional NPS historic museum. NPS staff would provide in-depth interpretation of Dr. Bethune and her contributions, and exhibits in the house would include historic and period furnishings from the years when she used the house as the headquarters for the National Council of Negro Women. Most of these exhibits would be permanent, with some changing exhibits. The emphasis of the archival collections would be to illustrate the highlights of her life and activities as well as the era in which she lived and the contemporaries with whom she worked.

Partnerships would be developed with organizations that focus on her legacy, life, and contributions to assist with furnishings and interpretive activities.

Offsite space for the archival collections would be a necessity for implementing this alternative (see Alternative 4 – Emphasis on Museum map).

To achieve desired future condition:

- Improve visitor experience
 - ◆ Increase number of exhibits.
 - ◆ Provide in-depth interpretive focus on Mary McLeod Bethune and her role in civil rights and African American women's history.
 - ◆ Expand collection of furnishings that were common in the Bethune times and artifacts pertaining to life and times of Dr. Bethune.
- Focus future archival acquisitions on the life, times, and contemporaries of Dr. Bethune.
- Provide space offsite for the archival collections.

- Increase staff by 1 (to a total of seven) to help accommodate ranger-led tours. Additional staff member would be as follows:

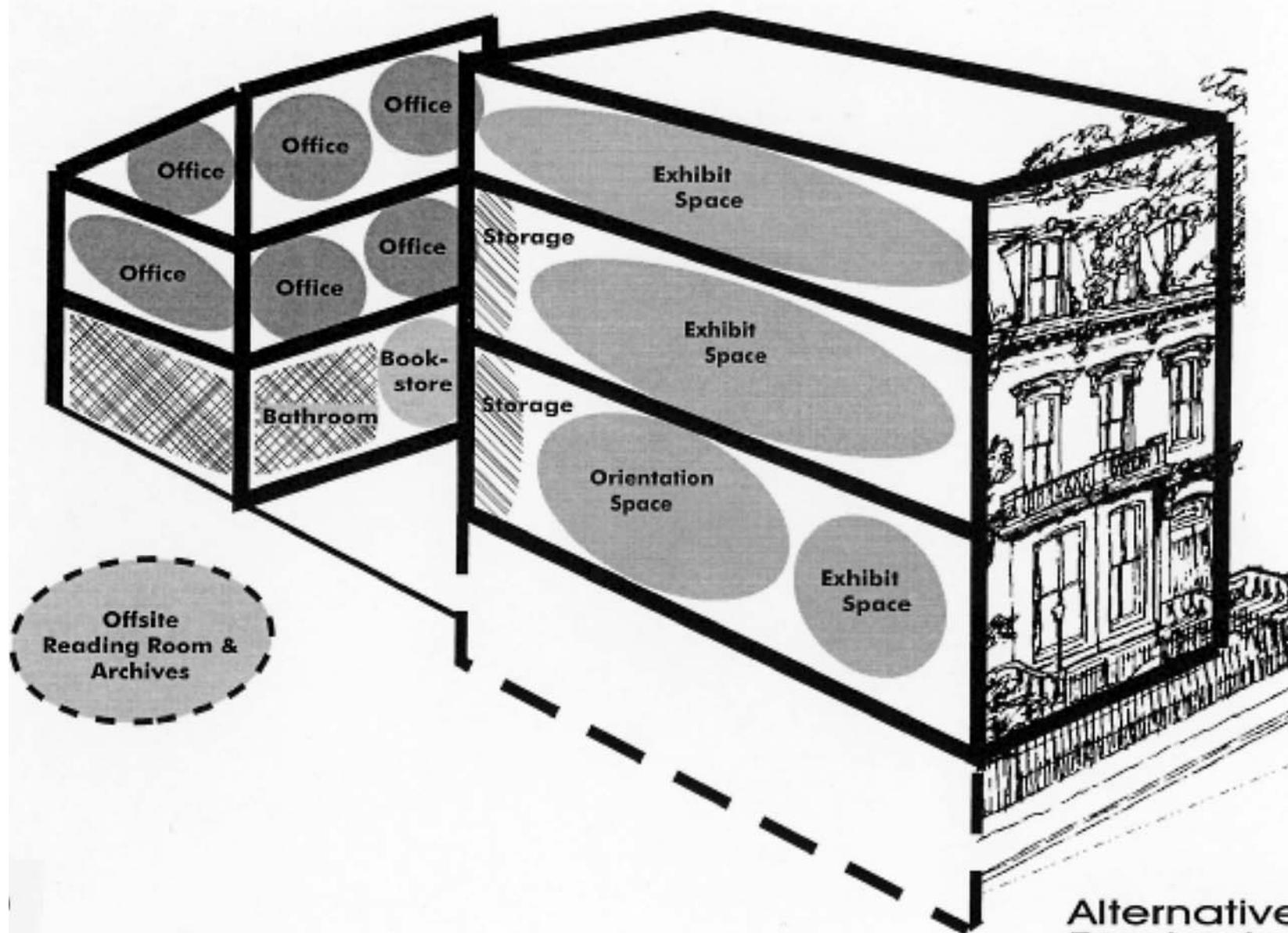
1 ranger/visitor use assistant

COUNCIL HOUSE

The council house would function primarily as a museum, with expanded exhibit space and an orientation area for visitors. Self-guided and ranger-led tours would be available along with offsite programs. Exhibits in the house would be permanent and would include historic furnishings from the period when Mary McLeod Bethune lived there. There would be traditional interpretive exhibits and media along with some archival materials and electronic exhibits. Although the focus would be on permanent exhibits, some changing and traveling exhibits would be provided. Educational programs would focus on the life contributions and legacy of Bethune. Stories would emphasize Bethune the person, Bethune the philosopher, and Bethune the activist. An elevator would be added to the back of the house, if necessary depending on the design of the new carriage house, to provide accessibility.

CARRIAGE HOUSE

The carriage house would be demolished pursuant to consultation with the State Historic Preservation Office under Section 106 of the National Historic Preservation Act, and a new accessible building would be constructed behind the council house to house the bookstore, visitor restrooms, and administrative offices.



Alternative 4 Emphasis on Museum

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In the footprint of the current carriage house, there would be room for about two handicap-accessible parking spaces. Depending on later design plans, there might be an elevator in the carriage house.

NEW INTERPRETIVE, ADMINISTRATIVE, OR ARCHIVAL SPACE

Space to accommodate the present-day archival collections would be leased at an

established facility that is adequately equipped to protect the collections. Additional space would be procured as the collections increased. The space would meet archival standards and would be managed by contracted professionals. Researchers would access the archival collections at this offsite location. Some archives would remain on exhibit in the council house.

COMPARATIVE COSTS OF GENERAL MANAGEMENT PLAN ALTERNATIVES

General management plans provide a framework for proactive decision making, including decisions on visitor use, natural and cultural resource management, and site development. The management plan prescribes resource conditions and visitor experiences that are to be achieved and maintained over time, and site development is considered in general needs rather than specifics. For the purposes of cost estimating, general assumptions are made regarding amounts and sizes of development. These assumptions are then carried across to all alternatives so that **comparable costs** can be considered for each alternative. Costs are analyzed for both initial development costs and life-cycle costs. Initial development costs are costs associated with construction and rehabilitation. Life-cycle costs include significant costs of the alternative over time, such as staffing and operating costs.

Costs in this document are not intended to replace more detailed consideration of needs, sizes, and amount of future development. They should **not** be used as a basis for money requests; further analysis must be completed first.

Preliminary development costs for the national historic site range from \$666,000 to \$2,379,120. Increased visitor services and protection of the resources align closely with the costs.

All alternatives propose new interpretive exhibits. Alternative 1 continues current staffing limitations, accessibility problems, researcher access problems, and administrative congestion.

Alternative 2, the preferred alternative, proposes the purchase and rehabilitation of an adjacent (or nearby) row house to provide space for orientation, restrooms, and offices. It would also provide for

accessible access to the front of the purchased house. Moving visitor services to an adjacent building would provide additional visitor service while slightly decreasing the impacts of visitors on the historic structure. In addition, the proposed changes to the archives would expand the audience that could be reached via electronic media. Administrative functions would be efficient and close to but separate from the visitor areas.

Alternative 3 proposes the purchase or lease of additional nearby space for offices, meetings, and orientation and would decrease ranger-guided tours and increase self-guided tours of the council house. This alternative also proposes the expansion of the carriage house. Alternative 3 proposes increased services to a narrower audience – those people who would be attending seminars and workshops. It shifts orientation and visitation to the new space. This could decrease visitation to the council house and thus decrease impacts on the historic house. However, this alternative would also increase the number of people reached through outreach programs.

Alternative 4 proposes building a larger structure to replace the carriage house and moving the archives offsite to a leased space, providing needed space for restrooms and bookstore. Thus, implementation of alternative 4 would increase exhibit space and provide space for new exhibits. Handicap access would be provided through a back entrance.

Costs and items considered are given in more detail in appendix C.

Differences in total life-cycle costs are much greater than the initial development costs, ranging from \$4.3 million in alternative 1 to a high of \$11.1 million in alternative 3. One major and two minor factors account for the

differences in life-cycle costs. The major difference is staffing. For the purposes of this comparison, an average salary of \$53,000 is assumed. Alternative 1 retains current staff levels, therefore limiting interpretation and visitor services that can be provided. Alternatives 2 and 3 propose increasing visitor services – alternative 2 increases onsite interpretation, Internet access, and outreach programs, while alternative 3 increases outreach and provides workshops and seminars to those with more time and interest. Alternative 4 increases staff numbers by one. The staffing accounted for \$8.0 and \$8.6 million

dollars of the life-cycle costs of alternatives 2 and 3.

The minor factors contributing to life-cycle costs were replacement costs for new square footage added and leasing costs. Maintenance on the existing house is assumed to be consistent for all alternatives. Replacement costs in alternatives 2 and 3 are estimated to be \$359,000 and \$309,000, respectively. Lease costs in present worth for alternative 4 are estimated to be \$257,000 over a 25-year period.

Comparative costs of the four alternatives are summarized in the following chart:

TABLE 1. SUMMARY OF COMPARATIVE COSTS

	Alternative 1	Alternative 2 Preferred alternative	Alternative 3	Alternative 4
Initial Development Costs	\$666,000	\$2,379,000	\$2,125,000	\$1,522,000
Total Life-Cycle Costs (Present Worth)	\$4,372,000	\$10,768,000	\$11,081,000	\$6,102,000

ENVIRONMENTALLY PREFERRED ALTERNATIVE

This table shows how each alternative would or would not achieve the requirements of sections 101 and 102(1) of the National Environmental Policy Act and other environmental laws and policies. In the Park Service, this requirement is met by (1) disclosing how each alternative meets the criteria set forth in section 101(b), which are listed in table 2 below, and by (2) presenting any inconsistencies between the alternatives analyzed and other environmental laws and policies (Director's Order 12, 2.7.E). According to section 101, this alternative would cause the least damage to

the biological and physical environment, and best protect, preserve, and enhance historic, cultural, and natural resources. It would also "create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." Although all alternatives in this plan rated well, not surprising because elements that were not environmentally sound were eliminated from consideration, the preferred alternative best met the criteria of section 101(b).

TABLE 2. ENVIRONMENTALLY PREFERRED ALTERNATIVE ANALYSIS

Criteria	Alternative			
	No Action 1	Preferred 2	Alternative 3	Alternative 4
Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.	NA	NA	NA	NA
Ensure safe, healthful, productive, and esthetically and culturally pleasing surroundings for all Americans.	L	H	M	H
Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.	L	H	H	M
Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and a variety of individual choices.	M	H	H	M
Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.	M	H	M	M
Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.	NA	NA	NA	NA
Total Points (assuming 2 points for a H (high) and 1 point for M (moderate)), No points for L.	2	10	6	5

The first and last criteria for the environmentally preferred alternative have negligible application to this small, two-building historic site in an urban environment. The no-action alternative scored low on providing healthful, productive, and pleasing surroundings for all Americans and providing a wide range of beneficial uses. The preferred alternative scored consistently high by providing healthful, productive, and pleasing surroundings for all Americans, providing the widest range of beneficial uses, preserving the resources of our national heritage, and achieving a balance between

population and resource use. Alternatives 3 and 4 scored lower in general because both of these alternatives focus on specific audiences or interpretive areas. The no-action alternative preserves most of the important historic cultural and natural aspects, but leaves the archive collections vulnerable to future problems. Alternative 4 demolishes a building that is considered to be eligible for listing on the National Register of Historic places but is not related to the significance of the site. Therefore the preferred alternative was also chosen as the environmentally preferred alternative.

TABLE 3. SUMMARY OF ALTERNATIVE ACTIONS

	ALTERNATIVE 1 □ NO ACTION	ALTERNATIVE 2 □ DUAL EMPHASIS ON MUSEUM AND ARCHIVES □ PREFERRED ALTERNATIVE	ALTERNATIVE 3 □ EMPHASIS ON ACTIVITIES AND PROGRAMS	ALTERNATIVE 4 □ EMPHASIZE MUSEUM OPERATIONS
Overall Concept	Continue current operations, with limited space, staff, and budget.	Place dual emphasis on the council house, which would be used as a museum, and on the archives; expand and link the two by using the archival materials in changing interpretive exhibits and programs. Provide a broad and balanced interpretive program. Provide more in-depth interpretation. Achieve Dr. Bethune's vision of an expansive archival collection of African American women's history. Acquire additional property for offices and visitor orientation.	Commemorate the site through the establishment of the Bethune Center for Human Rights. Use council house as a base for stimulating social change. Provide a place for groups to meet and engage in activities, workshops, and programs. Emphasize materials related to social justice and human rights in the archival collections. Acquire or lease additional property for offices and visitor orientation.	Use council house as a traditional NPS museum that commemorates the life and times of Dr. Bethune. Provide in-depth interpretation of Dr. Bethune and her contributions. Include historic and period furnishings in the exhibits. Use archival collections to illustrate the highlights of her life and activities, the era in which she lived, and her contemporaries. Lease offsite property for archival collections.
Council House	Continue use as a visitor center and administrative offices. Continue tours. Continue mix of mostly permanent exhibits about the council house, Bethune, the National Council of Negro Women, and temporary exhibits relating to African American women's history. Continue special programs, exhibits, and events as well as offsite programs. Continue to focus interpretive themes on Bethune the person and Bethune the philosopher. House and restrooms would remain inaccessible to visitors with mobility disabilities.	Use council house for interpretation, which would be provided via ranger-guided tours and self-guided exhibits. Balance exhibits between permanent and changing material, with new material coming from the archival collections. Present broad and comprehensive stories, relating to Bethune the person, activist, and philosopher and her legacy as well as her accomplishments and contributions.	Use council house for interpretation and, as it was historically, for meetings. Provide permanent and semipermanent exhibits, but emphasize changing exhibits that focus on current issues. Emphasize the interpretive theme of Bethune, the legacy. Continue to provide self-guided tours. Decrease ranger-led tours. Expand offsite interpretation, including traveling exhibits.	Use house as a museum, with expanded exhibit space and an orientation area for visitors. Provide ranger-led and self-guiding tours as well as offsite programs. Display traditional interpretive exhibits and media along with some archival materials and electronic exhibits. Focus on permanent exhibits with some traveling exhibits. Focus educational programs on the life contributions and legacy of Dr. Bethune. Emphasize interpretive themes of Bethune the person, Bethune the philosopher, and Bethune the activist. Add elevator to the back of the house if necessary to provide access for visitors with disabilities.

	ALTERNATIVE 1 □ NO ACTION	ALTERNATIVE 2 □ DUAL EMPHASIS ON MUSEUM AND ARCHIVES □ PREFERRED ALTERNATIVE	ALTERNATIVE 3 □ EMPHASIS ON ACTIVITIES AND PROGRAMS	ALTERNATIVE 4 □ EMPHASIZE MUSEUM OPERATIONS
Carriage House	Continue use as the storage space for the archival collections, archival staff offices, and research. Seek funding for the installation of a fire sprinkler system, vapor barrier, and insulation.	Renovate house and use as an administrative center and researchers' point of contact for the National Archives for Black Women's History. Provide state-of-the-art area for researchers. Accommodate some processing of archival collections. Provide some space for expanded archival staff and storing select/frequently accessed collections, or collections being processed.	Renovate and expand carriage house to include the archival collections, archival staff offices, and research space. Bring space for collections to archival standards. Provide enhanced technologies for archival access. Emphasize materials related to social justice, civil rights, human rights, and activism.	Tear down carriage house and replace with new building that would house bookstore, visitor restrooms, and administrative offices. Possibly include an elevator.
New Interpretive, Administration, or Archival Space	None.	Acquire new space adjacent to the council house for orientation, videos, lectures, museum shop/bookstore, office space, and accessible restrooms. Provide access for mobility disabled through a front entrance. Add elevator to provide access to all three floors of council house and administrative functions in the new space. Provide access between buildings. Move archival collections to the Museum Resource Center as necessary for space.	Provide orientation space, administrative offices, and primary space for meeting rooms and workshops in new acquired or leased space near the council house. Make this the primary contact point for visitors. Focus interpretive stories on Bethune the person, Bethune the activist, and Bethune the legacy. Tell stories through media and interpreters. Provide access and programmatic interpretation for visitors with mobility disabilities. Provide space for expanded administrative staff. Archival space is described above under the carriage house.	Lease offsite space that would meet archival standards to accommodate the current archival collections. Contract with others to manage the collections.
Partnerships	Continue cooperative agreements with Bethune Museum and Archives and the National Council of Negro Women.	Seek partnerships to provide assistance with archival acquisition, preservation, and research.	Seek partnerships with educational and social action groups to sponsor exhibits and educate people regarding Dr. Bethune's activities on behalf of interracial cooperation and social justice.	Develop partnerships with organizations that focus on Dr. Bethune's legacy, life, and contributions to assist with furnishings and interpretive activities.
Boundary Change		Seek approval to expand the boundary.	If space is purchased, seek approval to expand the boundary.	
Staffing	Continue current staff of six.	Hire seven more staff members.	Hire eight more staff members.	Hire one more staff member.

TABLE 4. SUMMARY COMPARISON OF IMPACTS OF IMPLEMENTING THE ALTERNATIVES

	IMPACTS OF ALTERNATIVE 1	IMPACTS OF ALTERNATIVE 2	IMPACTS OF ALTERNATIVE 3	IMPACTS OF ALTERNATIVE 4
Impacts on Cultural Resources	<p>The continuation of the current archival management program in the carriage house would have moderate to major long-term adverse impacts on the expansion, preservation, and use of the archival collections □ unless additional funds become available to upgrade the facility to archival standards.</p> <p>Ongoing rehab and maintenance efforts would have minor long-term beneficial impacts on the structures, landscape, and historic furnishings/artifacts at the national historic site, resulting in a limited degree of cultural resource preservation.</p>	<p>Implementing this alternative would be expected to have minor long-term adverse impacts on historic properties (due to adding doorways in the council house and an elevator and doorways in the adjacent property). However, implementing this alternative would provide long-term major benefits for preserving and protecting cultural resources, including the site's structures, landscape, historic furnishings/artifacts, and archival collections. The council house's documented architectural values that contribute to its listing on the National Register of Historic Places would be preserved.</p> <p>Systematic resource management approaches, improved cultural resource preservation/maintenance programs, and renovated facilities would provide long-term beneficial impacts. NPS staff would be in a better position to proactively manage and protect the cultural resources than under the no-action alternative.</p>	<p>Implementing this alternative would be expected to have no adverse effects on the council house and would provide long-term major benefits for its preservation and protection. By using historic furnishings and artifacts in traveling exhibits and outreach programs, their display in the council house would be minimized, thus removing some objects from their historic context and negatively affecting their onsite interpretive value.</p> <p>Systematic resource management approaches, improved cultural resource preservation/maintenance programs, and renovated facilities would provide beneficial effects.</p> <p>Enlarging and developing the carriage house to meet modern professional archival standards would provide additional space onsite for expanding, processing, researching, managing, and protecting the archival collections. However, enlarging the carriage house could have a major long-term adverse effect on the structure because its architectural values could be lost.</p>	<p>Implementing alternative 4 would provide long-term moderate to major benefits for preserving and protecting the council house, archival collections, historic furnishings/artifacts, and landscape at the national historic site.</p> <p>Installing an elevator at the rear of the council house would result in some long-term adverse impacts on the structure, but the building's documented architectural values, would not be affected. The demolition of the carriage house and its replacement with a modern structure would constitute a major long-term adverse effect.</p> <p>Systematic resource management approaches, improved cultural resource preservation/maintenance programs, and renovated facilities would provide positive beneficial effects.</p> <p>The National Park Service's ability to proactively manage preservation programs for these cultural resources would be enhanced.</p>

	IMPACTS OF ALTERNATIVE 1	IMPACTS OF ALTERNATIVE 2	IMPACTS OF ALTERNATIVE 3	IMPACTS OF ALTERNATIVE 4
Impacts on Visitor Use/Experience	Orientation and education would remain less comprehensive than desired. Crowding would continue when one or more large tours arrive. Outreach programs would not be enhanced. The physical limitations of the house (lack of space for orientation, a single toilet, and lack of access for visitors with mobility disabilities) and limited staff numbers would continue to result in long-term moderate to major adverse impacts on the quality of the visitor experience.	Increased space would decrease crowding, allow the provision of accessible restroom facilities, and accommodate visitors with mobility disabilities; it would also provide an orientation area for groups, more space for staff, and more space for exhibits allowing a more comprehensive interpretation of Dr. Bethune's accomplishments. A larger staff would be able to contact more people throughout the community and to create a new interpretive program and exhibits. Research efforts would be expedited, and opportunities for information would be greatly enhanced (onsite and over the Internet) with more staff and improved technology. There would be long-term moderate beneficial impacts on the quality of the visitor experience.	Increased space would provide an orientation area for groups (and accessible restrooms), more space for exhibits, space for more staff, and space for group meetings and activist/community programs allowing a broad interpretation of Dr. Bethune's accomplishments, focusing on her role as an activist. The new space would be physically separate from the council house, requiring programmatic interpretation. If space is leased in a nearby office, parking for visitors might be available. Added space and increased staff would have moderate long-term beneficial impacts on the quality of the visitor experience.	Visitors would have a "traditional" experience. More space for orientation, exhibits, and restrooms would reduce crowding and permit a comprehensive interpretation of Dr. Bethune's life and accomplishments. There would be fewer intrusions into the visitor experience by administrative activities – a long-term moderate beneficial impact. An elevator at the back of the house and/or the new building would have major long-term beneficial impacts on visitors with mobility disabilities. An increase of one staff member would slightly expand the extent of outreach programs and the number of tours conducted. Overall, there would be long-term minor beneficial impacts on the quality of the visitor experience.
Impacts on the Socioeconomic Environment	Because current site operations would continue, there would be negligible changes to the socioeconomic environment.	Rehabilitation of the carriage house would have minor short-term beneficial impacts on the local economy (from employment opportunities and material sales). Rehabilitation would also increase noise and possibly create traffic delays during construction – mostly minor inconveniences in the neighborhood. Occupants of the adjacent residence would require relocation, creating a minor to major adverse impact on those occupants. There could be beneficial impacts on the appearance of the neighborhood properties.	Rehabilitation and expansion of the carriage house would have minor short-term beneficial impacts on the local economy (from employment opportunities and material sales). Rehabilitation and expansion would also increase noise and possibly create traffic delays during construction mostly minor inconveniences in the neighborhood. Occupants of a nearby residence or business would require relocation, creating a minor to major and short- to long-term adverse impacts on those occupants. There could be beneficial impacts on the appearance of the neighborhood properties.	Removing the carriage house and building a new structure in its place would have minor short-term benefits on the local economy (from employment opportunities and material sales). This construction would also increase noise and maybe create traffic delays during construction mostly minor inconveniences in the neighborhood. Such construction would have long-term minor adverse visual impacts by eliminating the patio. Leasing an established facility for storing the archival collections would have negligible impacts on the socioeconomic environment.

	IMPACTS OF ALTERNATIVE 1	IMPACTS OF ALTERNATIVE 2	IMPACTS OF ALTERNATIVE 3	IMPACTS OF ALTERNATIVE 4
Impacts on Site Administration and Operations	<p>Implementing alternative 1 would have moderate long-term adverse impacts on site administration and operations. Conflicts resulting from incongruent uses and lack of space would continue. The lack of accessible access to the council and carriage houses would continue to limit access by mobility impaired employees and visitors. This violates NPS policies.</p>	<p>The museum/council house and archives would receive major long-term benefits from implementing this alternative. Both would expand into much needed space. Orienting large groups in another structure would help decrease the level of wear and tear and maintenance for the council house. Staff would have more space, which would be free from unavoidable visitor-related (tour) noise and disturbances. Three parking spaces would be available in the alley for staff use.</p> <p>Because a new building would be acquired, maintenance and utility costs would presumably double. Increased salary costs for seven additional employees would be a major long-term adverse impact on the site's budget but would be offset by the long-term gain for visitors from the additional services that would be provided.</p>	<p>Providing additional space for the archives and site administrative functions, and providing a new function (programs and meetings), as well as space for that function would have moderate long-term beneficial impacts on site operations. Site operations would have the necessary space to function effectively. If space is leased in a nearby office, parking for staff might be available.</p> <p>However, separating the staff into three locations would be a minor long-term adverse impact on site operations requiring more effort for communication.</p> <p>Because a new building would be acquired and the carriage house would be replaced with a larger structure, maintenance and utility costs would increase. The new programs — workshops and seminars — would also increase maintenance and utility costs.</p> <p>Increased salary costs for eight additional employees would be a long-term impact on the site's budget but would be offset by the long-term gain for visitors from the additional services that would be provided.</p>	<p>The implementation of alternative 4 would have minor to moderate long-term beneficial impacts on site operations by providing additional space for offices, the bookstore, and restrooms, allowing more efficient functioning than alternative 1.</p> <p>Maintenance of the facility that replaces the carriage house would be easier with sustainable modern plumbing, a modern heating and ventilation system, and modern electrical circuits.</p> <p>More of the archivist's time would be used for research and interpretation. Maintenance of the archives would be improved by contracting that service offsite.</p> <p>Visitor services and site administration would gain space and function more efficiently. The cost of offsite archival storage and the addition of one staff member would increase the site's operating costs but would be offset by the additional services that would be provided.</p> <p>Increased salary costs for the additional employee would be a long-term impact on the site's budget but would be offset by the long-term gain for the protection of the archives, slightly more efficient site operations, and slightly enhanced staff ability to provide additional visitor services compared to alternative 1.</p>

MITIGATING MEASURES

Because of current staffing and funding levels, some NPS standards are not being met at the site. This situation would probably continue without the approval of alternative 2, 3, or 4.

Any construction activity proposed would be done in areas that have already been disturbed due to the site's location in a dense urban environment. Mitigation measures would be employed to minimize temporary impacts from construction on soils, site access, and other resources. Such measures would include silt fences, mulch, reseeding, and traffic control devices where appropriate and necessary. To minimize contamination from construction equipment seeping into the soil, vehicles and other machinery would be maintained and checked frequently to identify and repair any leaks.

Appropriate restrictions, such as construction hours, delivery times, and location of staging areas, would be imposed on construction activities to minimize impacts on neighboring residents and businesses.

Standard mitigation measures would be used to lessen impacts on historic structures. These measures include documentation according to standards of the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) as defined in the Re-Engineering Proposal (October 1, 1997). The level of this documentation, which includes photography and a narrative history, would depend on significance (national, state, or local) and individual attributes (an individually significant structure, individual elements of a cultural landscape, etc.).

When demolition of a historic structure is proposed, architectural elements and objects may be salvaged for reuse in rehabilitating similar structures, or they may be added to the site's museum collection. In addition, the historical alteration of the human environment and reasons for that alteration would be interpreted to site visitors.

RECOMMENDATIONS FOR FURTHER RESEARCH AND PLANNING

Before beginning any actions that might affect the council house or carriage house (alternatives 2, 3, or 4), the National Park Service would prepare studies as prescribed in the NPS *Management Policies* and *Cultural Resource Management Guideline* (DO-28) and initiate consultation with the State Historic Preservation Office for the District of Columbia in compliance with the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.

Priorities for research would be based on the national historic site's primary purpose – to preserve and protect its historic structures and associated archival collections, furnishings collections, and artifacts (exhibits) while balancing opportunities for visitors to learn from and be inspired by them. To prevent significant long-term adverse impacts on the site and its resources, the following studies should be undertaken:

- (1) historic structure report – guides treatment and use of a historic structure
- (2) historic resource study – provides a historical overview of a park/site or region and identifies and evaluates a park's/site's cultural resources within historic contexts
- (3) cultural landscape report – guides treatment and use of a cultural landscape based on the historic context
- (4) historic furnishings report – provides a history of a structure's use and documents the type and placement of furnishings to a period of interpretive significance

The following plans should be completed to help implement the recommendations of this general management plan:

- (1) site interpretation plan – identifies park/site themes, describes visitor experience goals, and recommends a wide array of interpretive services, media, programs and outreach activities to communicate the park's/ site's purpose, significance, themes, and values
- (2) scope of collections plan – guides park's/site's acquisition and preservation of museum objects that contribute directly to interpretation and understanding of its themes, as well as any additional objects that the National Park Service is legally mandated to preserve
- (3) collections management plan – guides preservation of archival collections and museum objects
- (4) collection storage plan – guides collection storage at a park/site
- (5) exhibit plan – serves as a guide for developing exhibits that support the interpretive themes of a park/site
- (6) site administrative history – describes how a park/site was conceived and established and how it has been managed up to now

In addition, a historic structure preservation guide should be prepared to ensure compliance with the NPS inventory and condition assessment program.

Because private vehicle access to the site is limited by the small amount of on-street parking and most visitors arrive by tour or school buses that drop visitors at the house and park elsewhere, a study would be done after this *General Management Plan* to identify private vehicle and bus parking options.

AFFECTED ENVIRONMENT

CULTURAL RESOURCES

A SHORT BIOGRAPHY □ MARY MCLEOD BETHUNE: 1875□1955

Mary McLeod Bethune became one of the most celebrated African American figure of the New Deal era and extended her influence as an educator, civil rights activist, and advocate for women's equality for more than three decades from the 1920s to the 1950s. Born near Mayesville, South Carolina, July 10, 1875, she was the 15th of 17 children of former slaves who had purchased a small farm after the Civil War. Through the influence of her parents, Samuel and Patsy (McIntosh) McLeod, as well as her own self-determination, she raised herself from the position of a member of a cotton farming family to become an internationally known figure.

At a time when African Americans rarely attained advanced education due to discriminatory practices, Mary McLeod attended the recently opened Trinity Presbyterian Mission School in Mayesville from 1882 to 1886. Aided by a scholarship and the encouragement of her mentor, Emma Wilson, she attended Scotia Seminary for Negro Girls (later Barber-Scotia College) in Concord, North Carolina, a missionary outpost of northern Presbyterians that emphasized religious instruction and industrial education. At Scotia, she completed the high school program in 1892 and the Normal and Scientific Course two years later. Although she attended the Bible Institute for Home and Foreign Missions (later the Moody Bible Institute) in Chicago, Illinois, during 1894-95 with plans to become a missionary, she was refused a commission to serve in Africa by the Presbyterian Mission Board.

Disappointed by this turn of events, Mary McLeod returned to South Carolina and began her first teaching job at the Trinity Presbyterian Mission School in Mayesville,

where she had once been a student. Shortly thereafter, the Presbyterian board appointed her to a teaching position at Haines Normal and Industrial Institute in Augusta, Georgia. There she worked with Lucy Craft Laney, the dynamic black founder and principal of the school, with whom she had previously become acquainted and who would become Mary McLeod's model for serving others. During the 1896□97 school year, she organized the Mission Sabbath School for 275 of the city's poorest children. After a year, she transferred to teach at the Kindell Institute in Sumter, South Carolina (1897□98). Following her marriage to Albertus Bethune, a former teacher but then a men's wear salesman, in May 1898, the Bethunes moved to Savannah, Georgia, to further his business career. Their only child, Albert McLeod Bethune, was born the following year. Later in 1899, the family relocated to Palatka, Florida, where Mrs. Bethune established a Presbyterian missionary school. Albertus Bethune did not share his wife's missionary ardor, however, and they separated. (Albertus would die of tuberculosis in 1918.)

After five years of teaching and administering the school in Palatka, Mrs. Bethune's lifelong ambition to build a school for African American girls in the South led her to Daytona Beach, Florida, where, in October 1904, the Daytona Educational and Industrial Institute opened with Bethune as its president. The school, patterned after the Scotia Seminary, was opened in a rented house with six students □ five girls and her own son. As a result of her business and organizing skills, the assistance of the black community, and the largesse of some prominent white philanthropists vacationing in Florida, such as James M. Gamble and John D. Rockefeller, Mrs. Bethune's school grew from a small elementary school to incorporate a high school under the banner of the Daytona Normal and Industrial

Institute in 1918. Like most other African American institutions of the period, the school stressed religion, secretarial work, homemaking, and industrial education, with emphasis on agriculture and animal husbandry in tandem with academics; the school had a farm that focused on the production and handling of food products to meet the school's needs and to provide income. By April 1920, 47 girls had completed the full high school course, and 10, having completed the institution's teacher training program, were teaching in Florida's public schools.

In 1923 Mrs. Bethune's school merged with Cookman Institute, a Jacksonville, Florida, Methodist Episcopal Church college for men, to become the Daytona-Cookman Collegiate Institute with 42 faculty members and nearly 800 students. Six years later, the school's name was changed to Bethune-Cookman College in recognition of the important role that Mrs. Bethune had played in the school's growth and development. In 1932 the institution received regional accreditation as a junior college, and in 1936 the high school department was discontinued. In 1943, the college began conferring degrees in teacher education upon its first four-year graduates. Bethune would serve as the college's president (1932-42, 1946-47) and as president-emeritus, trustee, and chairman of its advisory board (1946-55).

As an educator in the South, Mrs. Bethune had concerns that extended beyond campus life. In the absence of a municipally supported medical facility for African Americans, the Daytona school, under her guidance, maintained a hospital for African Americans from 1911 to 1927. During much of this period, she also operated the Tomoka Mission Schools for the children of black families working the Florida turpentine camps. Ignoring threats made by members of the Ku Klux Klan, she organized a black female voter registration drive in Florida in

September 1920 following adoption of the 19th Amendment to the Constitution. As a delegate to the first meeting of the Southern Conference for Human Welfare, she voiced her opposition to degrading southern racial customs.

While directing the Daytona school, Mrs. Bethune gained national prominence through her work with the National Association of Colored Women. From 1917 to 1925 she served as president of the Florida Federation of Colored Women's Clubs, which opened a rehabilitative home for "wayward" and delinquent girls in Ocala in September 1921. In 1920 she founded and became president of a regional association, which became the Southeastern Federation of Colored Women's Clubs. One of the major triumphs of this organization was supplying leadership for the women's general committee of the regional Commission on Interracial Cooperation headquartered in Atlanta.

During 1923-24, Bethune served as president of the National Association of Teachers in Colored Schools, a professional organization of black teachers from mostly southern states.

In 1924 Mrs. Bethune's work culminated in her election to the presidency of the National Association of Colored Women, an office regarded by many as the highest to which an African American woman could then aspire. During her tenure in this position, she directed the organization increasingly beyond itself to the broader social issues confronting American society. As president of the National Association of Colored Women, Bethune attended meetings of the National Council of Women of the United States. This organization provided her with expanded contacts throughout American society. In 1925 this council of 38 organizations — 37 white and one African American — was the avenue for



Mary McLeod Bethune introducing Eleanor Roosevelt, who was a guest speaker at the Bethune Cookman College's 35th anniversary celebration, Daytona Beach, Florida. NPS photo.



The 50th anniversary celebration of the National Association of Colored Women. Mary Church Terrell, civil rights activist, suffragist, and founding president of the National Association of Colored Women, and Mary McLeod Bethune worked together on a wide variety of issues through the years. Bethune asked Terrell to serve as the first historian of the National Council of Negro Women. NPS photo.

the association's participation in the International Council of Women at its quinquennial conference, which attracted representatives from 35 countries to Washington, D.C. During her four years as head of the association, Bethune emphasized efficient management and developing a presence in national and international affairs and continued the organization's commitment to a scholarship fund and to the preservation of the Frederick Douglass home in the nation's capital as a national memorial.

Mrs. Bethune also worked aggressively to project a positive image of African American women to whites through her travels in the United States and abroad. By her oratory and her example she inspired African American women to greater levels of service. Most important, however, she strengthened the structure of the 10,000-member National Association of Colored Women by revising its constitution, improving the association's periodical, *National Notes*, and promoting greater communication between members. Through a strenuous financial campaign, she succeeded in establishing the association's first permanent national headquarters at 1114 O Street in Washington, D.C., in 1928, and employing its first paid executive secretary.

During the 1920s, Mrs. Bethune began to develop a national presence as a result of her appointment to the National Child Welfare Commission by Presidents Calvin Coolidge and Herbert Hoover. The latter invited her to a White House conference in 1930 and appointed her to the Commission of Home Building and Home Ownership in 1931.

Beginning in 1935, Mrs. Bethune's growing prominence was recognized by a number of honorary degrees and distinguished awards. During a 15-year period she would receive honorary doctoral degrees from eight colleges and universities:

LL.D., from
 Lincoln University, Oxford, Pennsylvania, 1935
 Howard University, Washington, D.C., 1942
 Atlanta University, Atlanta, Georgia, 1943
 Wiley College, Marshall, Texas, 1943
 Doctor of Humanities from
 Bennett College, Greensboro, North Carolina, 1936
 West Virginia State College, Institute, West Virginia, 1947
 Rollins College, Winter Park, Florida, 1949
 Benedict College, Columbia, South Carolina, 1950

In addition, she was awarded the distinguished Joel E. Spingarn Medal by the National Association for the Advancement of Colored People in 1935, the Francis A. Drexel Award by Xavier University in 1937, and the Thomas Jefferson Award by the Southern Conference for Human Welfare in 1942.

On December 5, 1935, in New York City, Dr. Bethune, along with 20 other African American women representing 14 black women's organizations, established the National Council of Negro Women (NCCW) to unite African American women in social planning and action on national and international levels around such issues as education, employment, health, housing, civil rights, and international relations.

Although she remained active in the National Association of Colored Women, she had come to believe that its member federations and clubs were not sufficiently involved in local matters and were instead overly oriented toward self-help, thus preventing the association from speaking as the authoritative national voice that black women needed. Eloquently, she wrote:



The National Council of Negro Women's second president, Dorothy Boulding Ferebee (1949-53) and president emeritus Mary McLeod Bethune at a planning meeting in the conference room of the council house. Ca. 1950. NPS photo.

The great need for uniting the effort of our women kept weighing upon my mind. I could not free myself from the sense of loss, of wasted strength, sustained by the national community through failure to harness the great power of women into a force for constructive action. I could not rest until our women had met this challenge.

Expressing a desire to see African American women united to “meet the unfolding of larger things,” the organization, under Dr. Bethune’s leadership, determined to pursue four principal objectives. These were to: (1) promote unity of action among women’s organizations in matters affecting the educational, cultural, economic, political, and social life in America; (2) build a fellowship of women devoted to developing friendly relations among all people in the world; (3) collect and preserve information about and affecting women; and (4) work for the complete elimination of any and all

forms of discrimination and segregation based on race, religion, color, national origin, and sex.

Serving as the president of the National Council of Negro Women from its founding until November 1949, Dr. Bethune focused the council’s activities on segregation and discrimination. She also represented the council at the 1945 founding conference of the United Nations in San Francisco, serving as an unofficial observer with the NAACP delegation along with two other prominent African Americans (W.E.B. DuBois and Walter White). To strengthen the organization, she expanded its membership by creating chapters in major cities throughout the nation. The council’s first office in Washington, D.C., was in her living room at 1812 Ninth Street, NW. When the growing organization required a larger permanent headquarters, she purchased a house at 1318 Vermont Avenue, NW (today known as the Mary McLeod Bethune

Council House National Historic Site), and employed a full-time staff. She also launched the influential *African American Woman's Journal*, later named *Women United*, which carried articles about the council and also about the many interests of African American women. A newsletter, *Telefact*, began publication in 1943.

By the end of Dr. Bethune's tenure as president, the council had become the largest federation of African American women's clubs in the United States. The council included 22 national women's organizations, including professional and occupational groups, both broadly based and subject-restricted academic sororities, Christian denominational societies, fraternal associations, auxiliaries, and various other groups. Today, the council, with its new headquarters at 633 Pennsylvania Avenue, NW (dedicated in October 1995), has an outreach of more than 4 million women in its membership through national affiliate organizations.

Dr. Bethune propelled the National Council of Negro Women to the forefront of the country's women's race organizations through its "Conference on Governmental Cooperation in the Approach to the Problems of Negro Women and Children," held on April 4, 1938, at the Department of the Interior and the White House. The 1938 conference revealed her basic strategy for racial advancement, which was to win policy-making and management positions in government for competent African American women. This emphasis upon upper-level employment was designed to benefit the black masses.

Forceful and articulate, Dr. Bethune was a natural leader and concerned herself with improving the status of all African Americans regardless of socioeconomic position or gender. Among other positions, she served as vice president of the Commission on Interracial Cooperation (1934-55), president of the Association for the Study of

Negro Life and History (1936-52), and vice president of the Southern Conference for Human Welfare (1938-48). Her support was important to the ongoing work of the National Urban League and the National Association for the Advancement of Colored People, serving as a vice president of both civil rights organizations for many years.

Dr. Bethune's most significant influence as an African American leader came, however, through her role in the administration of President Franklin D. Roosevelt. It was she who primarily educated Eleanor Roosevelt, whom Bethune had met in 1927 through her work with the National Association of Colored Women, on the problems of African Americans in the United States. She was one of several African Americans who had direct access to the White House, providing her with a unique opportunity to personally urge the president to advance civil rights and promote African American interests.

In August 1935, through Eleanor Roosevelt's influence, Dr. Bethune was appointed to the 35-member National Advisory Committee of the National Youth Administration (NYA). The agency's primary purpose was to help young people find employment during the depression and later during the World War II defense effort. She used her relatively minor advisory position as a springboard; in June 1936 she was placed in charge of Negro affairs within the National Youth Administration, and in January 1939 she became director of the Division of Negro Affairs. The directorship represented the highest federal appointment ever held by an African American woman to that time and facilitated her functioning in the agency's managerial hierarchy. In this position, she influenced the agency to adopt nondiscriminatory employment policies and to recognize special African American needs. She persuaded the National Youth Administration to expand the Division of Negro Affairs at the national level and to employ 27 African American administrative assistants at the state level.



Committee on Building Better Race Relations. NPS photo.

When the agency adopted a regional structure in 1942, she succeeded in having it employ regional African American affairs representatives. She also guided the administration toward broadening African American participation in the school aid program, including high school and college work-study, vocational training, and job placement. She succeeded in creating the Special Negro Higher Education Fund, administered through her office, for African American graduate students and colleges. The fund disbursed more than \$600,000 to 4,119 black students during a seven-year period.

In the training program for youth out of school, she pressed for opportunities for African Americans to learn skilled trades and argued for programs to assist black

youth in finding jobs. Though her demands often went unheeded during the depression, her persistent efforts later resulted in the employment of some NYA-trained African American youth in World War II defense industries that had not previously hired blacks.

Believing in the efficacy of widespread cooperative efforts among African Americans — an important factor in the founding of the National Council of Negro Women — Dr. Bethune organized the Federal Council on Negro Affairs, popularly called the “Black Cabinet,” in August 1936. The council was an informal group of blacks in government who worked together to strengthen African American support of the New Deal and to promote nondiscrimination in government facilities, greater



Mary McLeod Bethune receives the Liberian Flag from delegation and Mrs. Oswald P. Lord and Congresswoman Helen Gahagan Douglass. Ca. 1940. NPS photo.



Mary McLeod Bethune speaking to the Atlantic Coast Area Council of Religious Groups. Ca. 1940. NPS photo.

opportunities for government jobs, and the prevention of government actions harmful to blacks.

The Black Cabinet began meeting weekly at Bethune's home in Washington, D.C., and she was its influential spokesperson, urging that its energies be directed to the support of the emerging drive for civil rights. As a result of these efforts, she succeeded in creating channels of communication between civil rights organizations and the Roosevelt administration. She gained government support for two important National Conferences on the Problem of the Negro and Negro Youth in January 1937 and January 1939. Sponsored by the National Youth Administration and widely covered by the national media, these conferences spotlighted the plight of African Americans in the United States and provided a forum through which blacks could make policy recommendations to the government.

Dr. Bethune also worked for civil rights reform outside government channels. She participated in the New Negro Alliance's picket line in 1939 to support the hiring of black clerks by a Washington, D.C., drugstore chain. After nine Scottsboro boys were found guilty of rape in three controversial Alabama trials in 1931, she spoke and demonstrated in support of the drive to free the nine defendants, which resulted in their convictions being overturned by the U.S. Supreme Court in 1935. She was active in the efforts to gain rights for African American sharecroppers in the South, was a regular speaker at NAACP conferences and other civil rights organizations, and joined A. Philip Randolph's March on Washington movement in 1941.

During the war years, the National Council of Negro Women, under Dr. Bethune's leadership, focused on problems of African American women workers through a "Hold Your Job" campaign and worked for passage of a permanent Fair Employment



Mary McLeod Bethune stands at the White House gates. Ca. 1945. NPS photo.

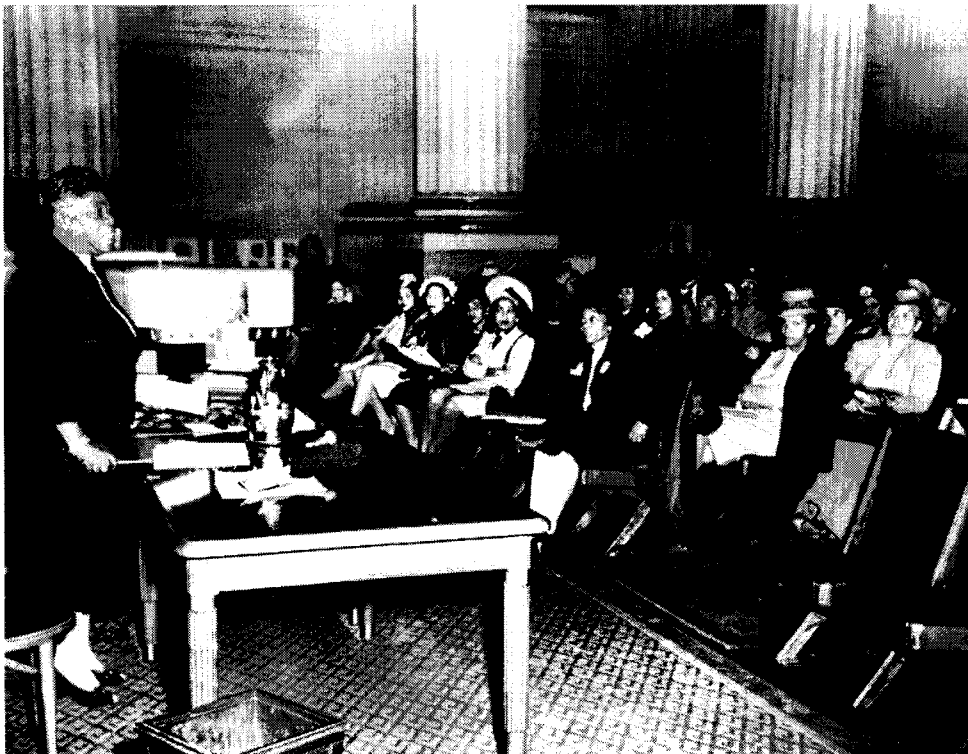
Practice Committee. Among other projects, the council campaigned for the admission of African American women into the Women's Auxiliary Army Corps (WAACS) and Women Appointed for Voluntary Emergency Service (WAVES), launched a liberty ship named for Harriet Tubman, participated in numerous conferences, and cooperated with other African American and women's organizations in various activities to support the American war effort as well as the cause for civil rights. Bethune led the National Council of Negro Women's "Buy War Bonds" drive and served as special assistant to the secretary of war for the Women's Auxiliary Army Corps. In 1944 she toured hospitals in the First, Second, and Third Service Commands, advising on

the rehabilitation of America's war veterans.

Dr. Bethune left her position in the government when the National Youth Administration ceased operations in 1944, and she resigned as president of the National Council of Negro Women in 1949 to retire to her home on the Bethune-Cookman College campus in Daytona Beach. This two-story, white frame residence, which had been constructed as her residence on the campus in 1914, would be designated a national historic landmark on December 2, 1974.

During her retirement, she remained active in the nation's political life, receiving many honors as an African American leader. In 1951, for instance, President Harry S. Truman appointed her to his Committee of

Twelve for National Defense. That same year, she became president of the Central Life Insurance Company of Florida, which she had helped found in the 1920s to provide insurance for African Americans in the state. In January 1952, she traveled to Liberia as an official U.S. representative to the second inaugural of President William V. S. Tubman. While there, she received that nation's coveted Star of Africa Award. In April of that year, the Board of Education of Englewood, New Jersey, canceled her engagement to speak in a public school because the House Committee on Un-American Activities had branded her a communist during the "red-baiting" years of the McCarthy era. A groundswell of public support, however, eventually made possible her appearance at the school.



Mary McLeod Bethune chairing a workshop in the U.S. Department of Labor auditorium during the National Council of Negro Women's 11th annual convention. Ca. 1946. NPS photo.

In 1953 Bethune established the Mary McLeod Bethune Foundation as a nonprofit corporation to promote her social and educational ideals. Undaunted, she continued to champion democratic values and faith in the American creed until she died at her home as the result of a heart attack on May 18, 1955, at the age of 79. One of the South's most well-known and prominent women, she was buried on a mound overlooking the campus of Bethune-Cookman College.

ARCHEOLOGICAL RESOURCES

No archeological surveys have been conducted at the national historic site. However, the likelihood of finding archeological resources at the site is low because the historic site and its surrounding area have been disturbed by activities associated with subdivision, development, and construction as part of the urban expansion of Washington, D.C., beginning in the 1870s.

ETHNOGRAPHIC RESOURCES

African Americans, and particularly African American women, are identified as a traditionally associated group with Mary McLeod Bethune Council House National Historic Site. At the national historic site, Bethune and the National Council of Negro Women, which she founded, spearheaded strategies and developed programs that advanced the interests of African American women and the black community from 1943 to 1966. The site is the location of the National Archives for Black Women's History, which houses the largest manuscript collection of materials solely dedicated to African American women and their organizations. Thus, the site is linked with their sense of purpose, existence as a community in the struggle to achieve civil rights, and development as an ethnically distinctive people. Thus, they represent a

special client population with long-term stakes in the integrity of the site's resources and the outcomes of management decisions that affect those resources.

MARY MCLEOD BETHUNE COUNCIL HOUSE NATIONAL HISTORIC SITE A BRIEF HISTORY

During much of the 19th century up to the Civil War, the area now called Logan Circle was known as Blodgett's Wilderness, consisting primarily of sparsely settled farmland. During and immediately after the Civil War, a few small-scale dwellings — most of them constructed of wood — were erected in the area, primarily to house the freed African Americans and runaway slaves then pouring into Washington. After the circle was graded and grass and trees were planted during the early 1870s, the area became a highly desirable neighborhood for white upper-class and upper middle-class Washingtonians as the nation's capital city expanded. In 1901 the bronze equestrian statue of Major General John A. Logan (1826-86), sculpted by Franklin Simons and erected on a pink marble base, was dedicated. Logan was commander of the Army of the Tennessee during the Civil War and later served as the commander of the Grand Army of the Republic. He also served as a member of the U.S. House of Representatives (1859-62, 1867-71) and the U.S. Senate (1871-77, 1879-86) from Illinois.

During the early 1870s, Anton Heitmuller, a real estate agent and land speculator, owned several lots on Vermont Avenue. In 1873-74, Heitmuller sold two of his lots to tobaccoist and real estate developer, William S. Roose. Roose later built houses on his property and sold the townhouse at 1318 Vermont to John J. McElhone, a reporter for the House of Representatives, and his wife Mary in 1875.

Following the death of John McElhone in 1890, Frank G. Carpenter, a well-known journalist whose popular column on Washington social life was syndicated in newspapers throughout the nation, and his wife Joanna purchased the residence in 1892. The Carpenters retained ownership until 1912 when the property was purchased by Italian immigrants Alphonso and Anna Gravalles. The Gravalles operated a ladies' tailoring shop in their new home. In 1918 two 8-inch steel I-beams were installed over the sliding alley door in the two-story brick garage (now referred to as the "carriage house") which had been erected in the early 1890s to replace a wood stable and shed. In 1934 a raised open rear porch, including a brick and steel frame and a wood floor and roof, was added to the residence. Mrs. Gravalles lived in the house for 31 years before selling the property to Dr. Bethune and the National Council of Negro Women for \$15,500 in December 1943.

By the 1940s, the Logan Circle area was located near the center of African American social life and culture in Washington and had attracted many African American professionals and activists. The area was also close to Dupont Circle, the home of many of the wealthiest white Washingtonians who were sources of patronage for Dr. Bethune and her organization. On October 15, 1944, the house was dedicated in a ceremony attended by Eleanor Roosevelt, Agnes Meyer, wife of the editor and publisher of the *Washington Post*, Dr. Charlotte Hawkins Brown, founder of the Palmer Memorial Institute in North Carolina, and NCNW members from various parts of the nation.

The purchase of the home was made possible in part by a \$10,000 donation from Marshall Field, publisher of some of the nation's leading newspapers, as well as contributions from the NCNW executive staff. Additional funds were raised by NCNW affiliates. Comprised of 15 rooms, one kitchen, and two bathrooms, the home, soon be designated as the "council house,"

would serve as the headquarters for the National Council of Negro Women, Dr. Bethune's official Washington, D.C., address until 1949, and guest accommodations for out-of-town visitors.

After its purchase by the council, the council house was modernized and redecorated, being furnished with the help of individuals, businesses, and organizations whose contributions were commemorated through the naming of the rooms. Among other things, the council installed new plumbing fixtures, heating radiators, and chimney flues and initiated roof repairs. In the elegant front parlor, which was furnished and decorated as a formal reception room by Abe Lichtman, owner of numerous Washington, D.C. theaters, the council received many prominent visitors, including Eleanor Roosevelt, Mary Church Terrell who had founded the National Association of Colored Women, and the United Nations delegate from India, Madame Pandit.

From 1943 until 1966, the paneled conference room in the council house was the site of many meetings in which the National Council of Negro Women defined its role in such historic decisions as the integration of African Americans in the nation's defense program and public school systems, as well as in campaigns to desegregate restaurants and theaters in Washington, D.C. A host of programs were initiated from 1318 Vermont to address the problems of inadequate housing, racial discrimination, health care, employment, and preservation of African American women's history. The site was also used as a rallying point for national organizations and individuals that participated in the March on Washington, on August 28, 1963.

In January 1966 the council house was damaged by a fire, started by a leak in the heating oil tank in the basement furnace room. While the building core remained intact, extensive water and smoke damage resulted. The National Council of Negro

Women was forced to relocate its headquarters to 1346 Connecticut Avenue in the Dupont Circle area. The council house stood abandoned until 1975, when the council received grant money to begin rehabilitation and restoration work after the building was listed on the Washington, D.C., Register of Historic Sites. In 1977, under a contract from the National Endowment for the Humanities, the National Council of Negro Women established a program named "The Bethune Historical Development Project" to develop a museum and archives for black women's history. Funding was obtained from the National Trust for Historic Preservation to restore the site. During the rehabilitation work, which continued through 1978, portions of the carriage house were converted into office and storage space.

On November 11, 1979, the Mary McLeod Bethune Memorial Museum and National Archives for Black Women's History was opened to the public. The First National Scholarly Research Conference on Black Women, entitled "Black Women: An Historical Perspective," timed to coincide with the opening of the museum and archives, was attended by more than 2,000 people. More than 50 scholars presented professional papers on the role of African American women in music, literature, familial relationships, professions, media, arts, and the American political and legal systems. While the council house was operated as a house museum, the carriage house served as an archival facility for the collection, preservation, and interpretation of materials devoted to African American women's history.

During 1980-81, the National Council of Negro Women began a second phase of restoration work to return the council house to an appearance reminiscent of the 1880s. The council house was designated a national historic site by an act of Congress in 1982. In addition, the act authorized and directed the secretary of the interior to enter

into agreements with the National Council of Negro Women under which the secretary might provide technical and financial assistance in restoring and interpreting the house museum and archives associated with the site. A cooperative agreement between the council and the secretary of the interior was approved on November 17, 1982. The site became an affiliated area of the national park system three years later.

In 1982 the Bethune Museum and Archives, Inc. was incorporated under the laws of the District of Columbia. The National Council of Negro Women continued to own the property; however, the national historic site was operated and maintained by the Bethune Museum and Archives. Although this association maintained a relationship with the council, the association had its own board of directors and raised its own funds. The council supported this arrangement so that the national historic site would fulfill Mary McLeod Bethune's dream of preserving and documenting the history and contributions of African American women in America. Thereafter, the Bethune Museum Association has sponsored changing exhibitions on African American women's history and culture, conducted lecture and concert series, produced educational videos and publications, and administered the archives in the carriage house.

During 1988-91, another phase of restoration work occurred at the national historic site. Exterior work included repairing the black and white marble walkway in front of the council house, installing new brown-stone steps on the stoop, refabricating the iron railing and gates, replacing the 40-pound tin roof, gutters, and downspouts, replacing the rotted wood framing beneath the roof, and installing two new air-conditioning units on the roof of the ell. A new rear porch with a slightly sloped roof supported by two fluted metal Doric columns resting on the ground replaced the raised porch that had been constructed in 1934. The entire rear wall of the structure

was stuccoed, and the kitchen door leading to the rear patio was sealed. Landscaping of the back yard consisted of new "period" plantings in brick planters and a patio laid with marble squares to match the front walkway.

On the interior of the council house, new wiring and air ducts were installed, the fireplace openings were sealed, the kitchen was converted into a gift shop, and some minor remodeling of the office space on the second floor was undertaken.

The two historic buildings lack a systematic approach to preservation and maintenance. A historic resource study is currently being contracted through a university cooperative agreement. The study will provide the baseline data necessary for the long-term interpretation of the site. A historic structure report is needed to provide for the rehabilitation, preservation, and maintenance of the structures.

In 1991 the National Park Service was authorized to acquire and manage the national historic site as part of the national park system. The site was acquired by the National Park Service in 1994, and the following year NPS staff were hired to manage the site. The National Park Service has recreated the feel of the council house during Dr. Bethune's association with the property through the use of historic photographs and surviving furniture. Today, the property commemorates the life and contributions of Mary McLeod Bethune and the many African American women who have shaped American history.

COUNCIL HOUSE

The council house is one of a number of structures erected in the Logan Circle area during the post-Civil War expansion of the city. Its dignified style, shared by other buildings on Vermont Avenue and neighboring streets, attracted investors and

residents to a newly developing part of the city.

The L-shaped row house, constructed in the Second Empire style which was popular at the time, stood three stories in height with a raised basement and attic and featured Neo-Grecian details and brick walls. It had a one-story bay window that dominated the three-bay-wide front façade on Vermont Avenue, a side-hall entrance, a rear ell that projects toward the west end of the lot, and a mansard roof. A wood stable and shed were at the rear of the lot adjacent to an alley.

The brick basement walls are about 15 inches thick. The structure's walls are constructed of red brick laid in an eight-course brick pattern, except for the east or street façade that has no rows of headers and is most likely a brick veneer over a brick supporting wall.

Ashlar stones resting on the brick foundation of the house support the front stoop. Five brownstone steps, flanked by heavy wrought-iron railings, lead to the front entrance. The newel posts of the railings have octagonal-shaped posts similar to those on the interior staircases. At the back of the house stands a one-story porch, added in 1991, that runs the length of the rear wall. Its two white metal columns with fluted shafts and Doric capitals support a slightly sloped roof of tin with standing seams.

Two interior brick chimneys, both with short straight stacks, rise through the house. One is centered along the common wall on the south side of the building. The other is centered along an interior wall at the west end of the rear ell.

The mansard roof, covered with tin sheets and hexagonal slate shingles, graces the street façade of the house. Three dormers, each capped by an arched wood pediment crowned by a carved wood keystone,



Mary McLeod Bethune and the National Council of Negro Women and the Daughters of the Elks dedicate the Emma V. Kelly Room in the council house. NPS photo.

project from the roof along the front of the house at the third story.

The condition of the interior and exterior of the house is good. The street façade, the structure, and the floor plan retain a high degree of historic integrity. The back porch/patio and the southeast façade were changed during the 1988-91 restoration work. Much of the grained wood and plaster on the first floor of the council house is new from the 1980s work. Although its basic floor plan remains unchanged and the interior is in good condition, the council house has lost much of its historic fabric.

The adjacent row house is under consideration for use by the National Park Service in one of the alternatives of this plan. Because it is a private property, not much is known about this adjacent house. It is known that this house holds several apartments, so the interior has been modified. The integrity of the exterior façade is intact.

FURNISHINGS

There are few furnishings original to the house. Many of the furnishings and artifacts in the structure were destroyed or damaged by the fire in 1966, and some pieces were removed during the decade following the fire when the house stood abandoned. However, a few furnishings from the Bethune era remain, although not all are in their original locations. The house still features the mahogany veneer table and 12 chairs (given to Dr. Bethune by President Truman) and once located in the rear parlor. Also remaining from the period are some chairs from the front parlor, and Dr. Bethune's bed, desk, and two of her paintings.

Most of Dr. Bethune's surviving furnishings, artifacts, and personal effects are housed in the Mary McLeod Bethune Home National Historic Landmark on the Bethune-Cookman College campus in Daytona Beach, Florida.

CARRIAGE HOUSE

The only outbuilding at the national historic site is a two-story brick carriage house at the rear end of the lot adjacent to an alley. Constructed during the early 1890s to replace an earlier wood shed and stable, the carriage house walls are laid in an irregular brick pattern with courses ranging from headers at every fifth row at the middle height of the walls to every eighth row at the top and bottom of the walls. Brick lintels add some ornament to the roofline. The windows in the east and west façades, facing the rear of the house and alley, respectively, have been removed and replaced with aluminum sliding windows. One small arched brick lintel in the east wall is the only evidence of original fenestration. A small door in the north end of the wall has replaced the large sliding garage door (installed in 1918) that opened on to the alley. The building has a flat roof covered with 40-pound tin. During 1988-91, the interior was completely gutted and converted into a space to house the National Archives for Black Women's History.

HISTORIC LANDSCAPE DESIGN

The council house is set on a slight rise of land above the street level. A black wrought-iron fence, about 3 feet in height, surrounds the front yard. Identical gates run along the sidewalk and around the yards of the neighboring buildings. Immediately inside the two arched wrought-iron gates is a short sidewalk with black and white marble squares laid in concrete in checkerboard pattern. Three stone steps lead to the next sidewalk with the same checkerboard pattern. This walk leads to the front stoop. The entire walk has been rehabilitated. The two houses south of the historic site have similar sidewalks. Flower beds line the perimeter of the yard and border a central lawn to the left of the front steps. In the center of the lawn stands a large black iron urn set on a pedestal that was installed in

the 1980s. This planter is similar to one that was original to the site. The two houses south of the council house also have planters in the same locations in their yards. The back yard, between the council house and the carriage house, has been redesigned into a small courtyard with side planters. It is believed that little if anything of the historic landscape of the back patio area still exists.

Because no cultural landscape report has been prepared for the site, it is not known if the landscape reflects characteristic features of the Bethune era. The landscape components are well maintained and compatible with those of nearby properties.

NATIONAL ARCHIVES FOR BLACK WOMEN'S HISTORY

History

The idea for an archival facility dedicated to the study of African American women's history dates back to the late 1930s when historian Mary Beard established the World Center for Women's Archives. Beard asked Dr. Bethune to serve as one of two African American sponsors of the World Center. In 1939 Bethune appointed Dorothy Porter of the Moorland Foundation at Howard University as the National Council of Negro Women's representative on the World Center's Negro Women's Committee on Archives.

Dr. Bethune was one of the first African American leaders to recognize the importance of preserving historical records, especially those pertaining to African American women, and the impact of those records on future generations. Proud of the rich and diverse contributions black women have made to American culture, she envisioned a permanent and growing collection that would be used by historians and educators.

Thus, when the World Center disbanded in 1940, the National Council of Negro Women assumed the initiative and established its own archives committee with Dorothy Porter as national chairperson. At that time, the council began promoting the study of African American history through exhibits at its national headquarters, preparation of history kits, and production of radio programs.

Sue Bailey Thurman, editor of the National Council of Negro Women's *African American Woman's Journal*, participated actively on the archives committee and became its chair in 1944. She promoted and planned for an archival facility, including publishing calls for donations of funds and materials in the journal. The council developed plans for a national archives day in 1946 to be held at Madison Square Garden in New York City.

The archives committee continued to function for more than 30 years under various titles. One milestone was the council's inauguration of the Bethune Collection on Black Women's Organizations in 1976. The National Council of Negro Women finally achieved its goal of establishing a national archives on November 11, 1979, with the dedication of the Mary McLeod Bethune Memorial Museum and the National Archives for Black Women's History. The National Park Service purchased the council house property and archives in 1994, and administers the archives through a cooperative agreement with the National Council of Negro Women and Bethune Museum and Archives, Inc. These organizations provide public programs on a monthly basis and in return are provided office space, administrative support, storage space, and financial assistance. The National Park Service has retained the original name of the national archives because of the name's ties to Mary McLeod Bethune and a desire to ensure the continuing visibility of the archives.

Archival Collections

The National Archives for Black Women's History houses both personal papers and organizational archives containing audio-tapes, correspondence, magazines, memorabilia, photographs, posters, reports, and scrapbooks. The collections document African American women's activism in the 20th century, with emphases on Mary McLeod Bethune, the National Council of Negro Women, and other affiliated African American women's organizations. The collections housed in the archives cover a wide range of issues, including civil rights, consumer concerns, education, employment, health, housing, internationalism, religion, and women. The archival facility has (1) more than 600 linear feet of manuscripts, (2) a small reference library of standard sources in African American women's history, including some unpublished papers from the First National Scholarly Research Conference on Black Women, (3) a vertical file on African American women, their organizations, and institutions, and (4) more than 4,000 photographs and other audiovisual materials. The National Archives for Black Women's History also serves as a clearinghouse for information on African American women's history resources and publishes an annual bibliography on African American women's history.

The largest collection in the archives, the Records of the National Council of Negro Women, consists of audiotapes, correspondence, memoranda, photographs, publications, and reports. The records document the period between the founding of the National Council of Negro Women in 1935 through the early 1980s. The collection demonstrates the wide influence that Mary McLeod Bethune had in both the African American community and in the administration of Franklin D. Roosevelt. Other topics with significant coverage include the council's role in the civil rights movement and its use of Great Society

programs to foster self-help initiatives in the rural South. The correspondence offers evidence of the regular interaction between the four presidents of the council and the White House and the leaders of other African American and women's organizations.

An abbreviated list of the collections in the National Archives for Black Women's History includes the following:

- records of the National Council on Household Employment, dealing with domestic workers, once the largest component of African American women workers
- records of the National Alliance of Black Feminists, which discusses the African American reaction to the National Organization of Women and the Equal Rights Amendment
- records of the National Association of Fashion and Accessory Designers
- several collections relating to African American women in the Women's Auxiliary Army Corps

- several collections relating to African American women in the nursing profession
- several collections from the affiliates of the National Council of Negro Women, including several professional sororities

Although the National Archives for Black Women's History archival collections have been processed according to professional standards, they are stored in the carriage house, which has some but not all environmental conditions necessary to ensure their long-term preservation. An inadequate fire protection system and the lack of a vapor barrier and adequate insulation further threaten their safety. A portion of the archival collection remains uncatalogued and unprocessed in leased space offsite.

For a discussion of related sites in Washington, D.C., please see the "Relationship to the Neighborhood, Related Sites, and Other Planning Efforts" section.

VISITOR USE / EXPERIENCE

Visitors access the site by foot, car, or bus. The nearest metro stop is about five blocks away. Parking is difficult to find for visitors arriving by car. No parking that is specifically for the site is provided. Buses stop in the street to allow visitors on and off. During tours, buses park in the lot of a nearby commercial establishment.

The total number of visitors per calendar year has declined somewhat during the past three years of the site's operation, with total annual visitor numbers ranging from a low of 6,577 in 1999 to a high of 8,213 in 1997. Through July of 2000, 4,415 visitors have been to the site. NPS staff contact an estimated 2,000 additional people through outreach programs. The archives services onsite researchers and questions over the phone. The number of contacts has ranged from a low of 220 in 1999 to a high of 417 in 1996. The number of researchers using the archives facilities has varied from a low of 51 in 1997 to a high of 105 in 1998.

Tours of the house are available year-round between 10:00 A.M. and 4:00 P.M., Monday – Saturday. Tours may be scheduled in advance for groups or individuals but also are available on a walk-in basis. They are conducted by two on-duty rangers. Visits to the archive facility are by appointment only.

Tours last about one hour and begin in the living room or reception area with an interpretive talk about Mary McLeod Bethune and a walk through the first and second floors of the house. A video lasting about 25 minutes tells visitors of Mrs. Bethune's life and times, her contributions as an educator, famous people in her acquaintance, her influence in politics, and her campaigns for human betterment.

Exhibits in the house are mostly permanent; one room has changing exhibits. The first floor exhibits include a history of the council

house, photographs of Mrs. Bethune with dignitaries such as First Lady Eleanor Roosevelt and photographs of past and present officers of the National Council of Negro Women. The second floor of the house contains Mrs. Bethune's bedroom with photographs of her birthplace, parents, the schools she founded, and the sugar cane farm she established in Florida.

The room Mary McLeod Bethune used as an office, on the second floor, contains photographs of her with President Franklin D. Roosevelt, his black cabinet, civic leaders, Vice President Harry Truman, and members of the National Council of Negro Women and the National Association of Colored Women. Also on the second floor are photographs of other black women educators and their students. An exhibit case shows examples of papers with themes similar to those in the archival collections.

As part of the historic site's outreach program, traveling exhibits are taken to schools and other venues in the community. The video and a slide program are presented to civic groups and to people who are unable to come to the historic site, such as senior citizens or those with disabilities.

The historic site's authorizing legislation directed the Park Service "to enter into a cooperative agreement with nonprofit organizations dedicated to preserving and interpreting the life and work of Mary McLeod Bethune and the history and contributions of African-American women." The National Park Service has entered into a cooperative agreement with the Bethune Museum and Archives, Inc. and the National Council of Negro Women, Inc. to provide the resources, direction, and coordination to present public programs, seminars and lectures and to interpret Bethune's life and work and the history and contributions of

African American women. The Bethune Museum and Archives has also arranged special programs such as lectures and cultural heritage series on black history; training in the use of archives; children's events such as a marionette program and holiday celebration programs; fundraisers and community outreach events such as Thanksgiving dinner for homeless women; educational programs for students; and film events.

Other special programs are provided throughout the year by site staff, and special programs for children and teachers are offered regularly. There are annual special programs during February (Black History month) and March (Women's History month,); at an open house the first weekend in June (for museum walk weekend); and at an open house on July 10 in honor of Mary McLeod Bethune's birthday.

SOCIOECONOMIC ENVIRONMENT

POPULATION AND ECONOMY

The region of socioeconomic influence is the Washington metropolitan area, which encompasses Maryland, Virginia and West Virginia in addition to the District of Columbia. According to the Bureau of Economic Analysis, the District alone had a population of 519,000 in 1999. The District ranked 50th in population in the state rankings of the nation and has decreased at the rate of 14.5% since the 1990 census. Annual per capita personal income in 1999 in the District of Columbia was \$39,858. This figure was 140% of the national average of \$28,542 and ranked second in the United States. The 1999 per capita personal income reflected a 5.7% increase from 1998 compared to 4.5% for the national change. According to the U.S. Department of Labor, Bureau of Labor Statistics, the unemployment rate in the District during the period January 1999 through May 2000 ranged from a low of 4.9% in April 2000 to 7.4% in January 1999.

In 1999 the services sector was the largest industry in the District of Columbia's employment base with 40.1% of earnings. Federal civilian government was the second largest industry with 35.0% of earnings followed by finance, insurance, and real estate with 5.7%. Earnings of persons employed in the District in 1999 increased by 8.1% from 1998. Considering industries with at least 5% of earnings in 1999, federal civilian government was the slowest growing and increased in earnings by 6.9% from 1998. The fastest growing employment sector was finance, insurance, and real estate, which increased 10.0% from 1998.

The total population of the metropolitan statistical area (MSA) was about 4,661,000 in 1998, the most recent year for which MSA statistics were available. The size of the Washington MSA ranked 6th in the

nation. Per capita personal income for the Washington MSA was 132% of the national average with \$36,043 and ranked 14th in the nation.

Unemployment in the metropolitan statistical area ranged from 2.0% in April 2000 to 2.9% in January and February 1999. (U.S. rates were 3.9% in May 2000 to 4.8% in January 1999.)

Growth in earnings of persons employed in the Washington MSA increased 7.6% from 1997 to 1998. The industries with largest earnings in 1998 were services, federal civilian government with 18.9% and state and local government with 7.6%. The slowest growing industry accounting for at least 5% of earnings was federal civilian government with an increase of 0.1%. The fastest growing industry in the Washington MSA was finance, insurance, and real estate.

Within the District of Columbia, neighborhoods are grouped into political divisions called wards for voting and representation purposes. The wards include advisory neighborhood councils that advise the District government on public policy, zoning, public improvements and other issues of local significance. Mary McLeod Bethune Council House National Historic Site is in Ward 2. In 1998 Ward 2 had a population of approximately 69,600 people, a decrease of about 11.5% since 1990. Sixty-one percent of the population was white, 31% was black, and the remainder belonged to Latino and 'other' ethnic groups. The median household income was \$46,732 compared to the District's median of \$43,011. In 1990, housing units in the ward were 60% renter occupied, 26% were owner occupied, and 14% were vacant.

LAND USE

Land use in the vicinity of the council house is a mix of residential and commercial buildings, public facilities, and city streets. The council house is one of a series of row houses in the Logan Circle Historic District. Some row houses and other large single-family homes in the immediate neighborhood have been converted to apartments or undergone renovation.

The national historic site is on one side of a triangular-shaped piece of land formed by Vermont, Massachusetts, and Rhode Island Avenues that lead to the three monument park areas of Logan, Thomas, and Scott Circles. Small commercial enterprises, such as restaurants, retail, and service businesses, are located behind the council house along 14th Street, which is a major commercial artery in the district. Mt. Olivet Lutheran Church is on Vermont Avenue a few structures away from the council house. Also nearby is a modern “settlement house” which provides shelter for homeless women.

Beyond the immediate neighborhood of the council house, land use includes an upscale commercial area with hotels, restaurants, and high-rise office buildings. Embassy Row is nearby along Massachusetts Avenue, so called because of the embassies from other countries. Notable sites in the vicinity include the Carter F. Woodson Home National Historic Landmark, Sumner School, and the Metropolitan AME (African Methodist Episcopal) Church.

VISUAL QUALITY

The visual character of the council house is that of a developed urban landscape, and views are dominated by buildings and city streets. Essentially all of the original landscape has been altered by grading, pavement, and building construction. In the primarily residential neighborhood of

Vermont Street, deciduous trees line the street, and smaller vegetation types add contrast to man-made structures. The structures and small landscaped areas exhibit varying degrees of maintenance, integrity, and modernization. Although the overall character reflects the Victorian era (1875–1900), there also are contemporary examples of architecture including a multistory apartment building across Vermont Avenue from the council house.

At the historic site, the three-story brick row house is set back from the sidewalk, and there is a small landscaped area in front of the house. A brick courtyard with planters separates the carriage house from the rear of the main building.

TRANSPORTATION AND SITE ACCESS

Numerous transportation modes provide access to the national historic site, including private vehicles, public transit, taxis, and special transportation services for tourists. Private vehicle use for site access is limited by the small amount of on-street parking and the lack of onsite parking. Public transit includes the Metrorail (subway) and Metrobus, which both provide access within a few blocks of the site. A proposed shuttle system that will link the National Mall with the downtown area is in the planning stages. This shuttle is proposed to make a stop within a few blocks of the council house. Due to the site’s proximity to major roads and hotels, access to taxis is within easy walking distance.

Most visitors arrive by bus, including school buses and commercial tour buses, which drop visitors in front of the council house and go to another location to park. The implementation of any of the alternatives would not be expected to result in a large influx of visitors to the site and would not have an appreciable impact on transportation or site access.

SITE ADMINISTRATION AND OPERATIONS

STRUCTURES

The Mary McLeod Bethune Council House National Historic Site consists of a row house and a carriage house.

Each floor of the council house has about 1,600 square feet (gross). The first floor contains interpretive exhibits, orientation/movie area, and a bookstore. The second floor contains interpretive exhibits, one office, and a public restroom. The third floor has four offices and an employee restroom. These offices are shared with the Bethune Museum and Archives. The basement contains mechanical equipment, some storage, one office, a kitchen, an employee eating area, and an employee restroom. Based on a group size of 15, a 20-minute video followed by a one-hour tour, a staff of two interpreters, and the existing operating hours, it has been determined that the overall carrying capacity should be about 105 people per day in the council house.

Visitation to the site consists of about 70% bus and school tours. Large groups are difficult to handle in the residential scale of the site. The visitor center and orientation area is in the former council room on the first floor of the house, and a small bookstore is adjacent to this room. The visitor center seats 30–40 people for viewing the video. This space, along with the single public restroom on the second floor, is not adequate when a full bus tour or more than one tour arrives. In addition, the house and public restroom are not handicap accessible.

Sound carries easily through the house. Two simultaneous tours interfere with each other. Tours are easily heard in the offices and are disruptive. Visitors often go past the theater ropes and enter into the offices on the third floor. The kitchen is no longer used for employee cooking, due to smells

permeating the entire house. The offices' sizes and shapes are residential rooms, and do not provide effective sizes as use for offices. In addition, the electrical and phone systems were designed for residential use and do not easily accommodate demands for computer access.

The council house is constructed on a rise from the public sidewalk. A low wrought iron fence and gate is located at the edge of the site. Visitors enter through the gate (which is locked when the site is closed), walk about 3 feet, climb four steps, walk another 10 feet, and climb seven additional stairs to get to the front door. Inside, the upper two floors are accessed by a steep narrow staircase. Another steep, almost spiral staircase is in the rear of the house. The house is almost impossible, for visitors or employees with mobility problems to enter; once inside, the second-floor (and only) public restroom is also nearly impossible to access.

The carriage house is a two-story brick structure that is contiguous with both the side and rear property lines. The archives, consisting of rolling shelves, restroom and storage are on the first floor. The second floor is offices. Functionally, visitors and researchers access the archival collections before any archival staff. However, due to the weight of the collections and the lack of structural support for the anticipated weight, the collections were located on the first floor. The office space is undersized and poorly designed for its functions. Space is not available to work on the collections. No separate space is available for researchers. Volunteers assisting with the collections have little space and very limited computer equipment. The storage space of the archives is close to full. If collections currently under discussion with the owner are acquired, the collections will exceed capacity of the archives.

The building has been retrofitted with a HVAC system to retain the archival collections at an optimum temperature. Security has been added to the carriage house. The carriage house has not been fitted with a dehumidifier, vapor barrier, insulation, or fire protection system and, therefore, does not meet all the environmental conditions for professional archival standards. The house has a humidifier (for winter) and plug-in dehumidifiers (for summer). The lack of a vapor barrier and insulation on the building minimizes the dehumidifying effects.

The first floor of the archives can be accessed via an alley behind the site. Stairs are the only way to get to the second floor. The archival offices on the second floor are not accessible to visitors or employees with mobility problems.

OPERATIONS AND MAINTENANCE

Mary McLeod Bethune Council House National Historic Site is one of eight sites of National Capitol Parks East, an administrative consortium of park areas. Park headquarters, the superintendent, and division chiefs are located at Anacostia Park, about 5 miles from the site.

Most routine maintenance is handled by the one site maintenance employee, including regular interior and exterior maintenance. Special events with the Bethune Museum and Archives and the National Council of Negro Women require organization, set-up, hauling, and various tasks. The site also joins in a seasonal house tour of the historic district and once a year provides a leaf pick-up as a good will gesture to the block. Larger or specialized maintenance tasks, such as structural repairs, house painting, or plumbing repairs, are handled by the

National Capitol Parks East maintenance staff or contracted out.

STAFF

The Mary McLeod Bethune Council House National Historic Site is owned and operated by the National Park Service, which continues to have a partnership with the Bethune Museum and Archives, Inc. and the National Archives for Black Women's History, Inc. Both the National Park Service and the Bethune Museum and Archives, Inc., have staff in the council house. The National Park Service currently has six employees:

- 1 site manager
- 2 site rangers
- 1 archivist (unfilled)
- 1 maintenance worker
- 1 secretary (unfilled)

The Bethune Museum and Archives staff currently consists of three employees:

- 1 program manager
- 1 program assistant
- 1 archival assistant (unfilled)

Staff levels are currently the minimum to keep the site open to the public. Any staff vacancies, or employees on vacation or sick leave impacts the ability of the staff to perform necessary functions, including interpretation and updating/modifying the Web site. For example, currently, the archives are closed until the archivist position can be filled. Minimal staff levels prevent development of interpretive programs from the archival materials. The staff numbers also limit updating the website and proactive involvement in schools and other local programs. No staff parking is provided.

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

The National Environmental Policy Act (NEPA) requires that environmental documents discuss the environmental impacts of a proposed federal action, feasible alternatives to that action, and any adverse environmental effects that cannot be avoided if the preferred alternative is implemented. The following portion of this management plan analyzes the beneficial and adverse impacts of implementing each of the four alternatives on cultural resources, the visitor experience, the socioeconomic environment, and site administration and operations.

The alternatives are primarily conceptual, and most potential consequences are presented in qualitative terms. If and when specific developments or other actions are proposed subsequent to this *General Management Plan / Environmental Impact Statement*, NPS staff will determine whether more detailed environmental documentation is needed in accordance with NEPA requirements.

Impact analysis discussions are organized by topics. Methods used in the environmental impact analysis precede discussions of each impact topic in alternative 1; alternatives 2-4 follow a similar format but do not repeat the method discussion.

CUMULATIVE IMPACTS

Each resource topic discussion in each alternative also details cumulative impacts and presents a conclusion. According to regulations developed by the Council on Environmental Quality (CEQ), regulation 1508.7, a cumulative impact is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or

person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

Past, present, and reasonably foreseeable future actions include structural and landscape rehabilitation programs and ongoing preservation efforts at the council house and by private property owners in the surrounding Logan Circle Historic District.

Ongoing participation in visitor events such as the self-guided Dupont-Kalorama Museum Walk and the Washington, D.C., Black History National Recreation Trail by Mary McLeod Bethune National Historic Site has cumulative beneficial impacts on visitors' knowledge of Washington's African American history by offering a broad range of stories.

IMPAIRMENT OF SITE RESOURCES

In addition to determining the environmental consequences of implementing the preferred and other alternatives, NPS policy (*Interpreting the National Park Service Organic Act, National Park Service Management Policies*) requires analysis of potential effects to determine whether or not actions would impair site resources.

The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park/site resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park/site resources and values. However, the laws do give the National Park Service the management discretion to allow impacts on park/site resources and values when necessary and appropriate to fulfill the purposes of the

park/site, as long as the impact does not constitute impairment of the affected resources and values. Although Congress has given the National Park Service the management discretion to allow certain impacts within a park or site, that discretion is limited by the statutory requirement that the National Park Service must leave park/site resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgement of the responsible National Park Service manager, would harm the integrity of park/site resources and values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park/site resource or value may constitute an impairment. An impact would be more likely to constitute an impairment to the

extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park/site;
- key to the natural or cultural integrity of the park/site or to opportunities for enjoyment of the park/site; or
- identified as a goal in the park's/site's general management plan or other relevant NPS planning documents.

Impairment may result from NPS activities in managing the park/site, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park/site. A determination on impairment is made in the "Environmental Consequences" section in the conclusion section for appropriate impact topics.

IMPACTS ON CULTURAL RESOURCES

METHODOLOGY

Section 106 of the National Historic Preservation Act requires a federal agency to take into account the effects of its undertakings on properties included in, or eligible for inclusion in, the National Register of Historic Places and provide the Advisory Council on Historic Preservation reasonable opportunity to comment. This also applies to properties not formally eligible but that are considered to meet eligibility criteria. All NPS planning and undertakings affecting historic properties are subject to the provisions of the 1995 Programmatic Agreement (PA) developed among the National Park Service, the Advisory Council on Historic Preservation, and the Conference of State Historic Preservation Officers. Applicable legislation and regulations and specific management procedures regarding cultural resources are detailed in the National Park Service's *Cultural Resource Management Guideline*, Director's Order No. 28, Release No. 5, 1998.

The methodology for assessing impacts to historic resources is based on the regulations of the Advisory Council on Historic Preservation (36 CFR 800) implementing Section 106. This includes: (1) identifying areas that could be impacted, (2) comparing that location with that of resources listed, eligible, or potentially eligible for listing on the National Register of Historic Places; (3) identifying the extent and type of effect, (4) assessing those effects according to procedures established in the advisory council's regulations, and (5) considering ways to avoid, reduce, or mitigate adverse effects (see "Mitigation" section).

Cultural resource impacts in this document are described in terminology consistent with the regulations of the Council on Environmental Quality (CEQ), and in

compliance with the requirements of both the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act. The Section 106 determination of effect for the undertaking (implementation of the alternative), required by the Programmatic Agreement, is included in the "Section 106 Summary" for each alternative.

INTENSITY OF IMPACTS

CEQ regulations require that impacts of alternatives and their component actions be disclosed. Therefore, the analysis of individual actions includes the identification and characterization of impacts, including an evaluation of impact intensity.

The intensity of impacts for cultural resources has been defined as negligible, minor, moderate, and major. Negligible impacts are barely perceptible and not measurable; confined to small areas or a single contributing element of a larger national register district or archeological site(s), with low data potential. Minor impacts are perceptible and measurable; remain localized and confined to a single contributing element of a larger national register district or archeological site(s), with low to moderate data potential. Moderate impacts are sufficient to cause a change in a character-defining feature; generally involve a single or small group of contributing elements or archeological site(s); with moderate to high data potential. Major impacts result in substantial and highly noticeable changes in character-defining features, involve a large group of contributing elements and/or individually significant property or archeological site(s), with high to exceptional data potential.

DURATION OF IMPACTS

The duration of the impacts considers whether the impact would be short term or long term. A short-term impact would be short lived or temporary due to construction, restoration, or demolition activities, and a long-term impact would be permanent and continual. Analysis of the duration of impacts is required under the National Environmental Policy Act but is not required and is not usually considered in assessing effects in terms of the National Historic Preservation Act.

TYPE OF IMPACTS

The analysis section provides a detailed analysis of the type of impacts that would or could result from implementing the actions proposed in each alternative. The conclusion section summarizes the key points or results of the analysis.

When analyzed under the National Environmental Policy Act and the National Park Service's NEPA guideline (DO-12), an impact on historic properties (cultural resources) is either adverse or beneficial. This effect can be partially or completely mitigated, and the reduction in intensity from applying mitigation efforts is an estimate of the effectiveness of mitigation. The cultural resources portion of the environmental consequences section for each alternative includes an analysis and conclusion that uses NEPA terminology.

Additionally, under the National Historic Preservation Act (Section 106), an impact on historic properties is either adverse or not adverse. Adverse effects under Section 106 may also be partially or completely mitigated; however, unlike NEPA analysis, the effect cannot be reduced and remains an adverse effect. To comply with this difference in terminology for Section 106, an additional "Section 106 Summary" discussion has been added for each

subheading under the impacts on cultural resources for each alternative. The required determination of effect for the undertaking (implementation of the alternative) is included in the "Section 106 Summary" sections for each alternative.

Effects under both the National Environmental Policy Act and the National Historic Preservation Act are considered adverse when they diminish the significant characteristics of a historic property.

Impacts can also be either direct or indirect. Direct impacts result from specific actions, such as demolition of historic structures. Indirect impacts often occur after project completion and are a result of changes in visitor use patterns or management of resources fostered by implementation of an action. Both direct and indirect impacts have been considered in the analyses

ALTERNATIVE 1 (NO ACTION)

Analysis

Cultural resources would continue to be protected to the greatest extent permitted under existing NPS policies and the availability of funding and NPS staff to carry out protection measures. However, current practices have the potential to result in minor long-term adverse impacts on the resources.

The current level of preservation treatment of the council house and the carriage house would continue as needs arise and funding permits in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. However, the lack of a comprehensive preservation maintenance program for the buildings, as well as possible increased visitation to the site, could result in the loss of some remaining historic fabric.

The extant landscape would be retained, and the current level of landscape maintenance would be continued as funding permits in accordance with *The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes* (1996). However, the lack of a comprehensive cultural landscape management plan could result in the loss of significant elements of the site's historic designed landscape.

The current level of historic furnishings/artifacts from the Bethune and National Council of Negro Women eras would be retained and preserved as funding permits in accordance with the National Park Service *Standards for NPS Museum Collections Management*, Director's Order No. 24, and the *NPS Museum Handbook*, Part I. Some pieces would continue to be exhibited in the council house, while others would be placed in NPS storage. However, the lack of a historic furnishings plan could result in the display of nonhistoric or inappropriate furnishings and artifacts.

The National Archives of Black Women's History would continue to be housed in the carriage house, a 1890s-era brick building that has capacity, research, processing, and resource protection limitations. Thus, the archival collections could not be expanded and existing space for researchers using the collections and for archivists processing the collections would remain limited. The archives would continue to be housed in a building that is not in accord with the standards established by the NPS *Records Management Guideline*, Director's Order No. 19, and the National Archives and Records administration. If funds became available to add a fire protection system, a vapor barrier, and insulation, the archives would be housed in a space that was in accord with these standards, which would result in longer-term major beneficial impacts.

Cumulative Impacts

Rehabilitation and preservation maintenance efforts at the council house since the mid-1970s, along with listing of the Logan Circle Historic District in the National Register of Historic Places and recent and ongoing preservation efforts by private property owners in the district, have had long-term beneficial cumulative impacts on the national historic site and its surrounding area. Implementation of this alternative would continue these programs and moderate cumulative beneficial impacts are anticipated in the future.

Conclusion

The continued implementation of NPS policies would help protect and preserve cultural resources at the national historic site to the extent permitted under current and projected funding/staffing levels. However, if visitation to the historic site increases, there would be a corresponding increase in the potential for adverse effects on the historic integrity of the structures, historic furnishings/artifacts, and landscape.

Unless the funds became available to upgrade the carriage house, the inability to expand, process, and preserve the archives for research use would continue to pose major cultural resource management issues for NPS management into the future and would have moderate to major long-term adverse impacts on the expansion, preservation, and use of the collections.

Ongoing rehabilitation and maintenance efforts would have minor long-term beneficial impacts on the structures, landscape, and historic furnishings/artifacts at the national historic site, resulting in a limited degree of cultural resource preservation. NPS staff would continue to conduct resource protection to the greatest extent permitted under existing policies and funding and staffing levels.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with cultural resources under this alternative.

Section 106 Summary

Under regulations of the Advisory Council of Historic Preservation (36 CFR 800.9) addressing the criteria of effect and adverse effect, actions proposed under this could adversely affect significant historic properties. The lack of a comprehensive preservation maintenance program for the buildings, as well as possible increased visitation to the site, could result in the loss of some remaining historic fabric, and thus have an adverse effect on the buildings' significant documented architectural values. The site's historic designed landscape could be adversely affected, because the lack of a comprehensive cultural landscape management plan could result in the loss of significant elements of the landscape. The archives could be adversely affected because they would continue to be housed in a building that is not in accord with the standards established by the NPS *Records Management Guideline* (Director's Order No. 19) and the National Archives and Records Administration. No adverse effects on the site's historic furnishings/ artifacts would result from implementing this alternative, although lack of a historic furnishings plan could result in the display of

nonhistoric or inappropriate furnishings and artifacts.

ALTERNATIVE 2 – (PREFERRED)

Analysis

This alternative would be expected to result in greater protection of cultural resources than would occur under alternative 1. Undertakings under this alternative would enable NPS staff to more proactively and effectively conduct cultural resource preservation programs.

In addition to the continuation of NPS cultural resource preservation policies and programs, NPS staff, along with partners, would prepare a historic structure report and initiate an enhanced cyclic maintenance preservation program to protect the historic architectural values of the council house and the carriage house. Functions in the council house would be simplified to eliminate conflicts between administrative and visitor activities, thus affording better protection of the structure's historic fabric at the site. Some minor long-term adverse impacts would result from the addition of doorways on each floor of the council house to provide access from the new elevator in the adjacent row house, but the structure's documented architectural values that contribute to its listing on the National Register of Historic Places would not be affected. Adding an elevator to the adjacent row house would not affect that structure's historic façade.

The preparation of a cultural landscape report and implementation of its recommendations would help protect any remaining elements of the site's historic designed landscape.

Historic furnishings and exhibits would be enhanced by the preparation and implementation of exhibit and historic furnishings

plans designed to guide their acquisition, preservation, and use.

Rehabilitation of the carriage house interior would provide a modern state-of-the-art archival/research repository that meets modern professional archival standards. The facility, along with offsite leased space, would provide improved preservation of the archival collections and additional space for expanding, processing, and researching the archival collections.

Cumulative Impacts

Historic resources at the national historic site have been lost or damaged through past development, visitor use, and natural events. Further adverse effects might accompany possible increased levels of visitors and researchers if this alternative were implemented. However, in conjunction with NPS policies for preserving and protecting cultural resources, measures to provide additional facilities for visitor orientation/education and establishment/implementation of systematic resource management approaches under this alternative (e.g., a comprehensive preservation structural maintenance program and upgrading archival facilities and services to meet professional standards, etc.) would enable the National Park Service to proactively manage and protect cultural resources. This would provide long-term major beneficial effects.

Structural and landscape rehabilitation programs and ongoing preservation efforts at the council house since the mid-1970s, along with recent and ongoing preservation efforts by private property owners in the surrounding Logan Circle Historic District, have had beneficial cumulative impacts on the national historic site and its surrounding area. Implementation of this alternative would add to these beneficial impacts in the future by providing additional facilities for visitor orientation/education and establish-

ment/implementation of systematic resource management approaches (e.g., a cyclic preservation structural maintenance program and upgrading archival facilities and services to meet professional standards, etc.).

Conclusion

Implementing this alternative would be expected to have minor long-term adverse impacts on the council house and adjacent historic property due to the addition of doorways to the council house and an elevator and doorways in the adjacent property. However, implementing alternative 2 would provide long-term major benefits for preserving and protecting cultural resources, including the site's structures, landscape, historic furnishings/artifacts, and archival collections. The council house's documented architectural values that contribute to its listing on the National Register of Historic Places would be preserved.

Systematic resource management approaches, improved cultural resource preservation/maintenance programs, and renovated facilities would result in long-term beneficial impacts. NPS staff would be in a better position to proactively manage and protect cultural resources by implementing this alternative than under the no-action alternative.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other

relevant NPS planning documents, there would be no impairment of site resources or values associated with cultural resources under this alternative.

Section 106 Summary

Under regulations of the Advisory Council on Historic Preservation (36 CFR 800.9) addressing the criteria of effect and adverse effect, actions proposed under this alternative would not have the potential to adversely affect significant historic properties. No adverse effects on the site's historic structures, designed landscape, furnishings and exhibits, and archival collections would result from actions proposed under this alternative.

ALTERNATIVE 3

Analysis

The continuation of NPS cultural resource preservation policies and programs and the initiation of a comprehensive maintenance preservation program would protect the documented historic architectural values of the council house. The elimination of conflicts between administrative functions and visitor activities would afford better protection of the structure's historic fabric. The emphasis on activist programs, expanded traveling exhibits, and offsite programs might decrease the number of persons visiting the site, thus enabling the Park Service to better protect the historic fabric of the council house.

The enlargement and development of the carriage house into a facility that meets modern professional archival standards would provide additional space onsite for expanding, processing, researching, and protecting the archival collections. However, enlarging the carriage house could have a major long-term adverse effect on the

structure because its architectural values could be lost.

As in alternative 2, the preparation of exhibit and historic furnishings plans would guide acquisition, preservation, and use of historic furnishings and artifacts as permanent, semipermanent, or traveling exhibits. Because this alternative's emphasis would be placed on traveling exhibits, and minimal historic furnishings would be exhibited in the council house, opportunities for onsite visitors to experience the house as it was in Bethune's time would be limited.

Cumulative Impacts

Historic resources at the national historic site have been lost or damaged through past development, visitor use, and natural events. In conjunction with NPS policies for preserving and protecting cultural resources, establishment/implementation of systematic resource management approaches under this alternative (i.e., enlarging and developing the carriage house into research/archival repository that meets professional standards, etc.) would enable the National Park Service to proactively manage, protect, and provide long-term major beneficial effects on the council house and the archival collections. Because this alternative would emphasize offsite outreach and activist programs, the number of site visitors would potentially be reduced, thus better enabling the National Park Service to protect the historic fabric of the council house.

Structural and landscape rehabilitation programs and ongoing preservation efforts at the council house since the mid-1970s, along with recent and ongoing preservation efforts by private property owners in the surrounding Logan Circle Historic District, have had beneficial cumulative impacts on the national historic site and its surrounding area. Implementation of this alternative would enhance the ongoing efforts to

preserve the council house and the archival collections.

Conclusion

Implementing this alternative would be expected to have no adverse impacts on the council house and would provide long-term major benefits for its preservation and protection.

When historic furnishings and artifacts were used in traveling exhibits and outreach programs, their display in the council house would be minimized, thus removing some objects from their historic context and negatively affecting their onsite interpretive value.

Systematic resource management approaches, improved cultural resource preservation/maintenance programs, and renovated facilities would provide beneficial effects.

Enlarging and developing the carriage house into a facility that meets modern professional archival standards would provide additional space onsite for expanding, processing, researching, and protecting the archival collections. However, enlarging the carriage house could have a major long-term adverse effect on the structure because its architectural values could be lost.

Locating facilities for expanding, processing, preserving, and using the archival collections onsite would enhance the NPS staff's ability to provide for their management.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establish-

ing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with cultural resources under this alternative.

Section 106 Summary

Under regulations of the Advisory Council on Historic Preservation (36 CFR 800.9) addressing the criteria of effect and adverse effect, actions proposed under this alternative could adversely affect significant historic properties. The carriage house and the site's landscape could be adversely affected because enlargement of the carriage house would result in the loss of the structure's architectural values and the loss of elements of the historic designed landscape. No adverse effects on the council house or the archival collections would result from actions proposed under this alternative. Minimizing display of historic furnishings and artifacts in the council house could result in removing some objects from their historic context, thus negatively affecting their onsite interpretive value.

ALTERNATIVE 4

Analysis

This alternative would have the same beneficial effects on the council house as described in alternatives 2 and 3. Installing an elevator at the rear of the council house would result in some adverse impacts on the structure, such as changing its appearance and possibly access. However, the effect would be minor because this portion of the house has been modified in recent years. Thus, the documented architectural

values that contribute to the building's listing on the national register would not be affected.

Demolishing the carriage house and replacing it with a modern building would result in the loss of the structure. Depending on the configuration of new construction, one or two elevators would be added to provide access to both the council house and the carriage house. If required, an elevator would be added to the back porch/patio area of the council house. This would have a minor long-term adverse impact because it is the portion of the house with the least historic integrity.

Under this alternative, actions for the acquisition, processing, preservation, and use of the archival collections would be transferred offsite via contract to a professional archival/research repository. This would provide a better (than present) physical environment for the archival collections and allow for expansion as the collections grow.

The preparation and implementation of an exhibit plan and a historic furnishings plan would enhance acquisition, preservation, and use of historic furnishings pieces and artifacts throughout the council house, enabling this structure to serve as an authentic historic house museum for visitor education and enjoyment. Thus, this alternative would provide for the greatest degree of preserving historic furnishings and artifacts and of interpreting them within their historic context.

The preparation of a cultural landscape report and the restoration/ maintenance of the landscape as recommended in this document would provide for the greatest degree of preservation of the historic designed landscape compared to the other alternatives evaluated in this document.

Cumulative Impacts

Historic resources have been lost or damaged at the national historic site through past development, visitor use, and natural events. In conjunction with NPS policies for preserving and protecting cultural resources, the establishment/ implementation of systematic resource management approaches under this alternative (preserving and adaptively using the council house as a historic house museum with an extensive display of historic furnishings/artifacts, preserving the archival collections in a professional archival/research repository, restoring the landscape based on cultural landscape report recommendations, etc.) would enable the National Park Service to proactively manage, protect, and provide long-term major beneficial effects.

Because the archival collections would be transferred offsite via contract to a professional archival/ research repository, their physical historic link to the national historic site would be severed. In comparison with the other alternatives, this alternative would provide for the greatest degree of acquiring, preserving, and interpreting historic furnishings/artifacts in the council house within the context of a historic house museum.

Because the carriage house would be demolished and replaced by a new structure, this alternative would result in a major long-term adverse impact on that structure.

Structural and landscape rehabilitation programs and ongoing preservation efforts at the council house since the mid-1970s, along with recent and ongoing preservation efforts by private property owners in the surrounding Logan Circle Historic District, have had beneficial cumulative impacts on the national historic site and its surrounding area. Implementing this alternative would add to these beneficial effects in the future.

by preserving and adaptively using the council house as a historic house museum featuring an extensive display of historic furnishings/artifacts, and by restoring the landscape based on cultural landscape report recommendations.

Conclusion

Implementing this alternative would provide long-term moderate to major benefits for preserving and protecting the council house, archival collections, historic furnishings/artifacts, and landscape at the national historic site.

The installation of an elevator at the rear of the council house would result in some long-term minor adverse impacts on the structure, but the building's documented architectural values that contribute to its listing on the National Register of Historic Places would not be affected. However, demolition of the carriage house and its replacement with a modern structure would constitute a major long-term adverse effect.

Systematic resource management approaches, improved cultural resource preservation/ maintenance programs, and renovated facilities would provide positive beneficial impacts.

The National Park Service's ability to proactively manage preservation programs for these cultural resources would be enhanced.

Impairment

Because there would be no major adverse impacts on resources or values directly

related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with cultural resources under this alternative.

Section 106 Summary

Under regulations of the Advisory Council on Historic Preservation (36 CFR 800.9) addressing the criteria of effect and adverse effect, actions proposed under this alternative could adversely affect significant historic properties. Demolition of the carriage house and its replacement with a modern structure would constitute an adverse effect on a building that is considered to be eligible for listing on the National Register of Historic Places.

Installing an elevator at the rear of the council house would result in minor adverse impacts on the structure, but the building's documented architectural values that contribute to its listing on the National Register of Historic Places would not be affected.

No other adverse effects on the council house, archival collections, historic furnishings/artifacts, and landscape would result from actions proposed under this alternative.

IMPACTS ON VISITOR USE / EXPERIENCE

METHODOLOGY

The impact analysis evaluated the effect of facility space and staff numbers on visitors, and how the alternative actions would affect visitors' opportunities to learn the stories of Mary McLeod Bethune and her life and times.

Intensity

The intensity of the impact considers whether the impact would be negligible, minor, moderate, or major. Negligible impacts were considered undetectable and would affect few visitors. Minor impacts were effects on visitor use that would be slightly detectable but not expected to affect access to and appreciation of primary resources and/or would affect a small number of visitors. Moderate impacts would be clearly detectable and would impact access to and appreciation of primary resources and/or would affect an appreciable number of visitors. Major impacts would have a substantial influence on access to and appreciation of primary resources and/or would affect most visitors.

Duration

The duration of the impact considers whether the impact would occur for a short term and be temporary in nature and associated with transitional types of activities, or if the impact would occur over a long term and/or have a permanent effect on visitor use.

Type of Impact

The type of impact refers to whether the impact on visitor use would be beneficial or adverse. Beneficial impacts would improve

visitor use and experience. Adverse impacts would negatively alter visitor use.

ALTERNATIVE 1

Analysis

Visitors to the national historic site and those attending outreach programs would continue to benefit from learning about the life and times of Mary McLeod Bethune. They would continue to gain an understanding and appreciation of her political activism and her legacy and the role she played in furthering the education of African Americans in the first half of the 20th century. However, orientation and education of visitors to the council house would remain less comprehensive than desired with current staff numbers and limited space for orientation and exhibits. Crowding would continue to occur during periods of higher visitation, especially when a large tour or more than one tour arrives at the same time. The number of outreach programs for schools and other groups would remain at current levels.

Staffing numbers would remain at the current level, and rangers would continue to lead scheduled guided tours for groups, and as time permitted, to other visitors. The potential would exist for some visitors to be unable to go on a tour if appropriate personnel are conducting other tours or are away from the site. The physical limitations of the house and staff numbers would continue to have long-term moderate adverse impacts on visitors' opportunities to experience in-depth the stories of Dr. Bethune and the council house.

The council house and second floor of the carriage house would remain inaccessible to visitors with mobility limitations. Visitors in this segment of the population would

continue to be unable to experience interpretive opportunities on the second floor of the house. The single toilet restroom on the second floor also would continue to be inaccessible to visitors who are mobility disabled. Parking would remain very limited, causing an inconvenience to visitors who arrive by private automobiles. In addition, the council house would remain inadequate to handle large numbers of people who arrive at the same time — such as tour groups that make up the greater part of visitor numbers. Lack of accessibility for visitors with disabilities, parking, and limitations of current facilities would continue to have long-term major adverse impacts on the visitor experience.

Cumulative Impacts

Mary McLeod Bethune National Historic Site is one of the sites on the self-guided tour, Dupont-Kalorama Museum Walk, and also is part of the Washington, D.C., Black History National Recreation Trail, which is part of the national trails system. Participation in these tours would continue to provide an avenue to make visitors aware of the national historic site and its importance in African American history. Visitors would continue to have the opportunity to learn through various sources about Bethune's life and times and her contributions as a political activist to education and society in general. Information, orientation, and interpretive programs, and activities at the site, combined with similar existing activities at other sites, would continue to result in visitors having opportunities to gain a broader knowledge of African American stories in the D.C. area and result in continuing moderate long-term beneficial cumulative impacts on the overall visitor experience.

Conclusion

Due to limitations of staff numbers and space, orientation and interpretive programs would continue to be less comprehensive than desired, crowding during tours would continue to occur, and outreach programs would not be enhanced. Visitors with mobility disabilities would have difficulty accessing the site, and restroom facilities would remain minimal and inadequate to handle visitor numbers. Implementing alternative 1 would have moderate to major long-term adverse impacts on the quality of the visitor experience.

With continuing opportunities to tour other museums and African American sites, visitors would could gain a broader knowledge of African American stories in the D.C. area, resulting in continuing moderate long-term beneficial cumulative impacts on the overall visitor experience.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with visitor experience under this alternative.

ALTERNATIVE 2 (PREFERRED)

Analysis

Acquiring an additional property would enhance the visitor experience. Increased

space would provide an orientation area for groups and more space to enlarge the scope and number of exhibits, including changing exhibits. Added space for exhibits would permit the presentation of a broad but comprehensive interpretation of Dr. Bethune's accomplishments and contributions. Additional space would reduce crowding during tours and provide more restroom facilities. A separation of site functions would be possible with more space, and there would be fewer intrusions into the visitor experience by administrative activities.

Increased staff numbers would permit a greater number of visitors than currently possible to experience a guided tour and gain a comprehensive understanding of significant stories of the historic site. A larger staff would be able to contact a wider audience of people in the schools and the community through the outreach program and to create new interpretive programs and changing exhibits, some of which would be from research on archival materials, on a regular basis. Providing researchers with a state-of-the-art work area would expedite their research efforts. Information on the Internet would provide additional and alternative opportunities for both researchers and other visitors. An increase in space, staffing levels, and research opportunities would have long-term moderate beneficial impacts on the quality of visitor experience.

Parking would be as difficult to find as in alternative 1, resulting in an inconvenience to visitors arriving in private automobiles. Lack of parking space would have a long-term moderate adverse impact on these visitors.

Cumulative Impacts

Mary McLeod Bethune National Historic Site is one of the sites on the self-guided tour, Dupont-Kalorama Museum Walk, and also is part of the Washington, D.C., Black

History National Recreation Trail, which is part of the national trails system. Participation in these tours would provide an avenue to make visitors aware of the national historic site and its importance in African American history. Visitors would have the opportunity to learn through various sources about Bethune's life and times and her contributions as a political activist to education and society in general. Information, orientation, and interpretive programs and activities at the site, combined with similar activities at other sites, would result in visitors gaining a broader knowledge of African American stories in the D.C. area and result in moderate long-term beneficial cumulative impacts on the overall visitor experience.

Conclusion

Increased space would provide an orientation area for groups and more space to enlarge the scope and number of exhibits, including changing exhibits. Crowding would be reduced, more and accessible restroom facilities would be available, and more visitors than currently would have the opportunity to gain in-depth knowledge of Dr. Bethune and her accomplishments. With an increase in staff, more visitors would have guided tour opportunities, and the outreach program would be expanded. Added space, increased staff, and more opportunities for education would have moderate long-term beneficial impacts on the quality of the visitor experience.

Research efforts would be expedited, and opportunities for information would be greatly enhanced (onsite and over the Internet) with more staff and improved technology. There would be long-term moderate beneficial impacts on the quality of the visitor experience.

As a result of opportunities to tour other museums and African American sites, visitors would gain a broad knowledge of African American stories in the D.C. area,

resulting in moderate long-term beneficial cumulative impacts on the overall visitor experience.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with visitor experience under this alternative.

ALTERNATIVE 3

Analysis

As in alternative 2, acquiring or leasing an additional property would enhance the visitor experience. Increased space would provide an orientation area for groups and more space to enlarge the scope and number of exhibits, including changing exhibits. Added space for exhibits would permit the presentation of a broad interpretation of Dr. Bethune's accomplishments and contributions, focusing on her role as an activist. An additional property would provide space for groups to meet, conduct workshops, and provide lectures and activities within the historic site's goals for social consciousness, but the council house would still remain inaccessible for visitors with mobility disabilities. An area for programmatic interpretation would allow these visitors to learn about the site more easily than they can now. Added space would reduce crowding during tours. For visitor convenience, restroom facilities

would be provided in the same location as the orientation area. A separation of site functions would be possible with more space and result in fewer intrusions into the visitor experience by administrative activities than is currently possible. Leased space could include a parking area, which would be a minor long-term beneficial impact on visitors by increasing availability of parking.

A larger staff would be able to contact a wider audience of people in the community and schools through an in-depth expanded outreach program, new interpretive programs, and changing exhibits on a regular basis. The implementation of this alternative would have a moderate adverse impact on visitors who were expecting a traditional house tour and a moderate beneficial impact on visitors or community members involved in special workshops or programs.

The onsite interpretive program would be primarily self-guided. Some visitors might not have the opportunity for a guided tour, but the special programs and the permanent and changing exhibits would provide visitors with a comprehensive presentation of story elements. Outreach programs would be greatly expanded providing a major benefit to schools and local groups. An increase in space and staffing levels would have long-term moderate beneficial impacts on the quality of visitor experience.

Cumulative Impacts

Mary McLeod Bethune National Historic Site is one of the sites on the self-guided tour, Dupont-Kalorama Museum Walk, and also is part of the Washington, D.C., Black History National Recreation Trail, which is part of the national trails system. Participation in these tours would provide an avenue to make visitors aware of the national historic site and its importance in African American history. Visitors would have the opportunity to learn through various sources

about Bethune's life and times and her contributions as a political activist to education and society in general. Information, orientation, and interpretive programs and activities at the site, combined with similar activities at other sites, would result in opportunities for visitors to gain broad knowledge of African American stories in the D.C. area and result in moderate long-term beneficial cumulative impacts on the overall visitor experience.

Conclusion

Increased space would provide an orientation area for groups, more space to enlarge the scope and number of exhibits, and space for activist/community programs. An area for programmatic interpretation would accommodate visitors with mobility disabilities. Crowding would be reduced, more restroom facilities would be available, and more visitors than currently would have the opportunity to gain in-depth knowledge of Dr. Bethune and her accomplishments. With an increase in staff, more visitors than are currently contacted would benefit from an expanded and comprehensive outreach program. If space is leased in a nearby office, parking might be available for visitors. Added space and increased staff would have moderate long-term beneficial impacts on the quality of the visitor experience.

As a result of opportunities to tour other museums and African American sites, visitors would gain a broader knowledge of African American stories in the D.C. area, resulting in moderate long-term beneficial cumulative impacts on the overall visitor experience.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and

whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with visitor experience under this alternative.

ALTERNATIVE 4

Analysis

Visitors to the council house would benefit from a 'traditional' cultural park experience with primarily permanent exhibits including historic furnishings and some changing exhibits such as archival materials. Interpretive media, including electronic exhibits, would focus on and help visitors understand Dr. Bethune in the context of her era and the long-lasting influence of her accomplishments.

Moving the archival collections offsite and constructing a building behind the council house would enhance the visitor experience by increasing space at the national historic site. Increased space would provide an orientation area for groups and more space to enlarge the scope and number of exhibits. More space for exhibits would permit a comprehensive interpretation of Dr. Bethune's accomplishments and contributions. Added space would also reduce crowding during tours and provide more restroom facilities. A separation of site functions would be possible with more space and result in fewer intrusions into the visitor experience by administrative activities than is currently possible.

Parking space would be as difficult to find as in alternative 1, resulting in an inconvenience to visitors arriving by private

automobile – a long-term moderate adverse impact.

An elevator at the back of the house and/or the new building would make the council house handicapped accessible and allow visitors with mobility disabilities to experience the site more easily than they can now. This action would have major long-term beneficial impacts on this segment of the population.

Staffing numbers would be one more than the current level, and rangers would lead scheduled guided tours for groups and, as time permitted, for other visitors. Some visitors might be unable to experience a tour if appropriate personnel are conducting other tours or are away from the site. Traveling exhibits would enable community groups to learn about Dr. Bethune without visiting the site, but the programs would be somewhat limited with minimal staff. The level of staff numbers would result in moderate long-term adverse impacts on visitors' opportunities to experience the site and its stories. Overall, implementing alternative 4 would have long-term minor beneficial impacts on the visitor experience.

Cumulative Impacts

Mary McLeod Bethune National Historic Site is one of the sites on the self-guided tour, Dupont-Kalorama Museum Walk, and also is part of the Washington, D.C., Black History National Recreation Trail, which is part of the national trails system. Participation in these tours would provide an avenue to make visitors aware of the national historic site and its importance in African American history. Visitors would have the opportunity to learn through various sources about Bethune's life and times and her contributions as a political activist to education and society in general. Information, orientation, and interpretive programs and activities at the site, combined with similar activities at other sites, would result in visitors having

opportunities to gain a broad knowledge of African American stories in the D.C. area and moderate long-term beneficial cumulative impacts on the overall visitor experience.

Conclusion

Visitors to the council house would benefit from a 'traditional' cultural park experience with interpretation focusing on Dr. Bethune. There would be more space than currently available for an orientation area and enlarging the scope and number of exhibits, permitting a comprehensive interpretation of Dr. Bethune's accomplishments and contributions. Crowding during tours would be reduced, and there would be more restroom facilities. A separation of site functions would be possible with more space and result in fewer intrusions into the visitor experience by administrative activities than is currently possible. The result would be a moderate long-term beneficial impact.

An elevator at the back of the house and/or the new building would have major long-term beneficial impacts on visitors with mobility disabilities.

Staffing numbers would be one more than the current level, which would slightly expand the extent of outreach programs and the number of tours conducted on site. The level of staff numbers would result in moderate long-term adverse impacts on visitor's opportunities to experience the site and its stories, but partners assisting with interpretation activities would help mitigate these impacts. Overall, implementing alternative 4 would have long-term minor beneficial impacts on the quality of the visitor experience.

As a result of continuing opportunities to tour other museums and African American sites, visitors would have opportunities to gain a broad knowledge of African American stories in the D.C. area, resulting in

moderate long-term beneficial cumulative impacts on the overall visitor experience.

Impairment

Because there would be no major adverse impacts on resources or values directly related to the significance of the site and whose conservation is (1) necessary to fulfill specific purposes identified in the

establishing legislation or proclamation of Mary McLeod Bethune Council House National Historic Site, (2) key to the cultural integrity or opportunities for enjoyment of the site, or (3) identified as a goal in the site's general management plan or other relevant NPS planning documents, there would be no impairment of site resources or values associated with visitor experience under this alternative.

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

METHODOLOGY

The impact analysis evaluated three socioeconomic areas, including the local economy and population, land use, and visual resources. Quantitative analysis of potential effects on socioeconomic areas was not conducted because the additional cost of that analysis would not be reasonably related to the expected increase in the quantity and/or quality of relevant information. The analysis of effects is qualitative, and professional judgement is applied to reach reasonable conclusions as to the intensity and duration of potential impacts.

The impact analysis is based on changes to the local economy and visual resources as a result of construction activities and changes to land use with the acquisition of additional property.

Intensity

The intensity of the impact considers whether the impact on the socioeconomic environment would be negligible, minor, moderate, or major. Negligible impacts were considered undetectable and would have no discernible effect on the local economy, including employment and retail sales; would not result in incompatible changes to land use trends, and would not perceptibly modify the quality of the visual landscape. Minor impacts were effects that would be slightly detectable but not have an overall effect on the local economy, changes in land use trends, or the quality of the visual scene. Moderate impacts would be clearly detectable and could have an appreciable effect on the local economy, land use trends, and the quality of the visual landscape. Major impacts would have a substantial influence on and could permanently alter the local economy, land use trends, and the quality of the visual landscape.

Duration

The duration of the impact considers whether the impact would occur for a short term and be temporary in nature and associated with transitional types of activities, or if the impact would occur over a long term and/or have a permanent effect on the socioeconomic environment.

Type of Impact

Type of impact refers to whether the impact on the socioeconomic environment would be beneficial or adverse. Beneficial socioeconomic impacts would improve local economic conditions, such as providing jobs and increasing sales revenue of local businesses. Beneficial impacts on land use would include those changes that would be compatible with local land use plans, regulations, and trends. Impacts beneficial to visual quality would improve the streetscape through maintenance activities and efforts to preserve historic character.

Adverse socioeconomic impacts would negatively alter local economic conditions, including increasing the unemployment rate or decreasing sales revenues to local businesses. Adverse impacts on land use would negatively alter use patterns or result in new uses that would not be compatible with current trends. Adverse impacts on visual quality would degrade the scenic resource through lack of maintenance and the addition of modern intrusions.

ALTERNATIVE 1

Analysis

The implementation of alternative 1 would be expected to result in negligible changes to the socioeconomic environment. Current

trends in contributions by visitors to the local economy would likely continue. The historic site would maintain the current configuration of space, and current land use, visual resource conditions, and site access trends would be expected to continue into the future.

Cumulative Impacts

The past and present preservation efforts of the historic site along with rehabilitation and maintenance of nearby private properties have resulted in major long-term beneficial cumulative impacts on the visual resources of the neighborhood. These improvements could result in increased sales and economic benefits in the future to commercial proprietors along the street behind the council house as the surrounding neighborhood becomes more upscale.

There would be no known cumulative impacts on land use because the historic site would maintain its current land ownership and visitation patterns.

Conclusion

Impacts on the socioeconomic environment from implementing alternative 1 would be negligible because current site operations would continue.

ALTERNATIVE 2 (PREFERRED)

Analysis

The rehabilitation of the carriage house would have a minor short-term beneficial effect on the local economy. The project would result in additional short-term employment opportunities in the building trades during the period of construction. Some businesses would have an increase in sales for purchases of supplies and equipment for construction activities.

Relative to the local employment and economic base, the economic benefit from implementing alternative 2 would be short-term and minor.

Construction activities could have short-term adverse impacts on drivers using the alleyway behind the council house. Unavoidable inconveniences such as construction vehicles blocking access to some residences and businesses along the alley would result in temporary delays and possible traffic congestion. However, construction activities would be conducted to ensure the least possible restriction to neighborhood residences and businesses. Safety and convenience of the general public and residents would be provided at all possible times. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

Under alternative 2, the Park Service would pursue acquiring the property adjacent to the council house to provide space for administrative offices and visitor services. The private property would be purchased at fair market value, resulting in monetary benefit to the landowner. The property would be removed from the local real estate tax rolls, resulting in a corresponding loss of revenue to the community. Although the loss of tax revenue would be long term and adverse, it would be minor relative to the overall tax base. The sale of the property would result in a minor short-term beneficial economic impact for the current property owner.

Acquisition of the adjacent property would result in a decrease in land available for residential use within the neighborhood and preclude the possibility of future private development. Use of the land would change from a residential function to public park use. The administration and visitor services

facility would remain compatible with adjacent land uses in the neighborhood. In addition, there would be no known conflict with land use plans or regulations. The impacts of alternative 2 on land use would be beneficial, long-term, and minor.

Implementing alternative 2 would likely displace one or more occupants in a structure. The relocation would be a short-term major disruption to those having to move. However, the sense of disruption would decrease over time as relocatees adjust to a new home and surroundings.

Economic impacts on residential relocatees would be negligible. Eligible residents would receive federal relocation assistance through the Uniform Relocation Assistance and Real Properties Acquisition Act of 1970, Public Law 91-646, which ensures that residential relocatees would be offered decent, safe, and sanitary housing within their financial means. The program renders assistance in determining eligibility and relocation needs, provides information on availability and prices of comparable housing, ensures availability of comparable dwellings, and provides advisory services to minimize relocatees' adjustment to a new location.

Beneficial impacts on visual resources would be anticipated from implementing alternative 2. Treatment of an acquired building would be according to NPS maintenance and preservation guidelines. If the property were from the Victorian era, acquisition would help preserve the character of the historic district and result in a long-term beneficial effect on the neighborhood's visual resources.

Cumulative Impacts

Past, present and potential future rehabilitation efforts by private owners are resulting in an upscale neighborhood, which is likely to price some of the current residents out of

the rental market. The removal of another residential property from this market by the Park Service would contribute to the lack of affordable housing for some people. Relative to the overall housing availability, implementing alternative 2 would have a minor, short-term, adverse cumulative impact on some people.

A nearby hotel is being converted into condominiums, and more apartments are being constructed in the neighborhood, which will provide additional housing units. However, the market value of these properties is unknown at this time. As a result, more people will be living in the neighborhood and in the event that an increase in visitor numbers occurs, there would be greater competition for parking space. Implementing alternative 2 would have major long-term adverse cumulative impacts on local parking availability.

The past and present preservation efforts of the historic site along with rehabilitation and maintenance of nearby private properties have resulted in major long-term beneficial cumulative impacts on the visual resources of the neighborhood. Improvements include increased maintenance, compliance with the historic attributes of the neighborhood, and renovation of façades and front yards. These improvements could result in increased sales and economic benefits in the future to commercial proprietors along the street behind the council house, as the neighborhood becomes more upscale.

Conclusion

Rehabilitation of the carriage house would have minor short-term benefits on the local economy with an increase in employment opportunities and sales of materials during the construction period. An increase in noise and possible delays from construction traffic would result in temporary and minor inconveniences in the neighborhood. This alternative potentially would require the

relocation of occupants of the adjacent residence, resulting in minor to major adverse impacts on current occupants of the property. Land use would change to that of a public, park use, and beneficial impacts on the appearance of the neighborhood properties would be expected.

ALTERNATIVE 3

Analysis

As in alternative 2, rehabilitation and expansion of the carriage house would have a minor short-term beneficial effect on the local economy. The project would result in additional employment opportunities and an increase in sales in the building trades during the period of construction. Relative to the local employment and economic base, the economic benefit from implementing alternative 3 would be short-term and minor.

Construction activities would have the same short-term adverse impacts as alternative 2 on neighborhood traffic, with unavoidable delays and possible traffic congestion. However, safety and convenience of the general public and residents would be provided at all possible times. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

Under alternative 3, the Park Service would pursue acquiring or leasing a property near the council house to provide space for administrative offices and visitor services. The purchase of private property would have the same economic impacts as alternative 2. The seller(s) would benefit monetarily with a sale at fair market value. The property would be removed from the local real estate tax rolls, but the loss of tax revenue would be minor relative to the overall tax base.

The acquisition of a property would result in a decrease in land available for residential or commercial use within the neighborhood and preclude the possibility of future development. Use of the land would change from a residential or commercial function to public park use, but the administration and visitor services facility would remain compatible with adjacent land uses in the neighborhood. In addition, there would be no known conflict with land use plans or regulations. Leasing would have the same impacts except that the possibility of future development would not be precluded. The impacts of alternative 3 on land use would be long-term, beneficial, and minor.

As in alternative 2, implementing alternative 3 would likely displace one or more occupants in a structure. Eligible residents would receive federal relocation assistance under the Uniform Relocation Assistance and Real Properties Acquisition Act of 1970, and economic impacts on residential relocatees would be negligible.

If the property that was acquired or leased houses a business, the relocation assistance program includes provisions for moving costs of personal property, expenses in searching for a replacement site, and necessary expenses for reestablishment at the new site. Businesses such as stores and service establishments that rely on a customer base from the immediate surrounding area potentially would experience short-term to long-term major adverse economic impacts if a comparable site for relocation is not available nearby. Impacts would be short-term and minor to those area-dependent businesses that would be able to relocate within the same neighborhood. It is possible that the impact could become long term if the business relocates to an inconvenient site that results in the loss of a major portion of the customer base. Customers might experience minor long-term adverse impacts such as the inconvenience of requiring more time to travel to more distant locations.

Beneficial impacts on the appearance of the neighborhood properties would be anticipated from implementing alternative 3. Treatment of an acquired building would be according to NPS maintenance and preservation guidelines. Acquisition or leasing would be anticipated to help preserve the character of the historic district and result in a long-term beneficial effect on the neighborhood's visual resources.

Some lifestyle and social changes might result from visitors walking or otherwise traveling between the council house and a nearby property, particularly with respect to neighborhood residents. Potential impacts might include a loss of privacy for neighbors and possible trespass by visitors. However, because of the urban character of the area, the magnitude of these adverse changes would be anticipated to be short-term and minor.

Cumulative Impacts

Past, present and potential future rehabilitation efforts by private owners are resulting in an upscale neighborhood, which is likely to price some of the current residents out of the housing market. The removal of another residential property from this market by the Park Service would contribute to the lack of affordable housing. Relative to the overall housing availability, implementing alternative 3 would contribute to an increase in local property values and have a moderate long-term adverse cumulative impacts on some residents.

A nearby hotel is being converted into condominiums, and more apartments are being constructed in the neighborhood, which will provide additional housing units. However, the market value of these properties is unknown at this time. As a result, more people will be living in the neighborhood and in the event that an increase in visitor numbers occurs, there would be greater competition for parking

space. Implementing alternative 3 would have major long-term adverse cumulative impacts on local parking availability.

The past and present preservation efforts of the historic site along with rehabilitation and maintenance of nearby private properties have resulted in major long-term beneficial cumulative impacts on the visual resources of the neighborhood. These improvements could result in economic benefits in the future to commercial proprietors along the street behind the council house.

Conclusion

Rehabilitation and expansion of the carriage house would have minor short-term benefits on the local economy. An increase in employment opportunities and sales of materials would occur during the construction period. An increase in noise and possible delays from construction traffic would result in temporary and minor inconveniences in the neighborhood. This alternative potentially would require the relocation of occupants of a nearby residence or business resulting in minor to major and short- to long-term adverse impacts on these occupants. Land use would change to that of a public, park use, and beneficial impacts on the appearance of the neighborhood properties would be expected.

ALTERNATIVE 4

Analysis

Similar to construction activity impacts in alternatives 2 and 3, removing the carriage house and building a new structure behind the council house would have a minor short-term beneficial effect on the local economy. The project would result in additional employment opportunities and an increase in sales in the building trades during the period of construction. Relative to the local employment and economic base, the

economic benefit from implementing alternative 4 would be short-term and minor.

Construction activities would have the same short-term adverse impacts as alternatives 2 and 3 on neighborhood traffic with unavoidable delays and possible traffic congestion. However, safety and convenience of the general public and residents would be provided at all possible times. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

Removing the carriage house from the rear property line could open a view from ground level to the garages across the alley from the historic site and to the space that would become available for parking. If the new building were constructed directly behind the council house in the space of the courtyard, the sense of two spatially separated buildings would be replaced with a feeling of enclosure and structural development. Construction in this location would eliminate the secluded residential patio. The new structure would be compatible with the architectural style of the council house. Structure and landscape treatments vary behind nearby row houses. None of these changes would be visible from the street (because the council house is a row house). Only people using the alley and the two adjacent neighbors would be impacted. Implementing alternative 4 would result in long-term minor adverse impacts on visual resources from within and outside the historic site.

Leasing an established facility for storing archival collections would have negligible impacts on the socioeconomic environment. However, if an established facility were not available, leasing another property would have negligible to minor long-term impacts on land use depending upon land use in the surrounding area. Changing land use from

commercial to public would have negligible impacts, whereas changing land use from residential to public would be a minor impact. Depending on the existing land use mix and specific neighborhood, this impact could be adverse or beneficial. Although the numbers would be anticipated to be small, staff and researchers arriving at the facility in a residential neighborhood would have higher visibility than in a commercial area. A change in land use, whether from commercial or residential, would be anticipated to remain compatible with adjacent land uses, and no conflict with land use plans or regulations would be expected.

Cumulative Impacts

The past and present preservation efforts of the historic site along with rehabilitation and maintenance of nearby private properties have resulted in major long-term beneficial cumulative impacts on the visual resources of the neighborhood. These improvements could result in economic benefits in the future to commercial proprietors along the street behind the council house.

Conclusion

Removing the carriage house and constructing a new building behind the council house would have minor short-term benefits on the local economy. An increase in employment opportunities and sales of materials would occur during the construction period. An increase in noise and possible delays from construction traffic would result in temporary and minor inconveniences in the neighborhood. Removal of the carriage house and construction of a new building would have long-term minor adverse impacts on visual resources within the historic site by removing the patio.

Leasing an established facility for storing archival collections would have negligible impacts on the socioeconomic environment.

If leasing a residential or commercial property were necessary, negligible to minor changes to land use would occur.

ENVIRONMENTAL JUSTICE

Under a policy established by the secretary of the interior to comply with Executive Order 12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"), departmental agencies should identify and evaluate, during the scoping and/or planning processes, any anticipated effects, direct or indirect, from the proposed project or action on minority and low-income populations and communities, including the equity of the distribution of the benefits and risks. If any significant impacts on minority and low-income populations and communities were identified during the scoping and/or planning processes, the environmental document should clearly evaluate and state the environmental consequences of the proposed project or action on minority and low-income populations and communities.

It was determined that none of the actions of the alternatives considered in the *Final General Management Plan / Environmental Impact Statement* would result in major direct or indirect adverse effects on any minority or low-income population or community. However, NPS acquisition of one residence in the neighborhood could result in a minor impact on a minority or low-income population if the property commanded relatively low rents. The Logan Circle neighborhood, in which the national historic site is located, has a population consisting of mixed racial and economic groups and a mixture of land use and building conditions, and the area has been undergoing revitalization in recent years as a result of restoration and preservation efforts.

The following information contributed to the determination that none of the actions of the alternatives would result in major direct or indirect adverse effects on any minority or low-income population or community:

1. The actions proposed in the alternatives would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population or community.
2. The impacts on the physical environment that would result from implementing any of the alternatives would not have major adverse effects on any minority or low-income population or community.
3. The alternatives would not result in any identified adverse effects that would be specific to any minority or low-income community.
4. The National Park Service has had an active public participation program and has equally considered all public input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
5. No minority groups in the Logan Circle neighborhood, the District of Columbia, or the National Capital region would be disproportionately affected.
6. Effects on the Logan Circle neighborhood, the District of Columbia, and the National Capital regional socioeconomic environment because of implementing the alternatives would be marginally beneficial and would occur over a number of years. Impacts on the socioeconomic environment would not be expected to significantly alter the physical and social structure of the county or region.

IMPACTS ON SITE ADMINISTRATION AND OPERATIONS

METHODOLOGY

Basis of Analysis

Impacts for each alternative were evaluated by assessing changes to operations that would be necessary to meet various operational requirements outlined in each of the alternatives. The effects were compared to existing operations, facilities, and staffing, which are described in alternative 1.

Intensity

The intensity of the impact considers whether the impact would be negligible, minor, moderate, or major. Negligible impacts are considered undetectable and would have no discernible effect on site operating costs, facilities, staff numbers, and staff efficiency. Minor impacts are effects on site operations and facilities that would be slightly detectable but not expected to have an overall effect on the costs or ability of the site staff to provide services and facilities. Moderate impacts would be clearly detectable and could have an appreciable effect on site operating costs, staff efficiency, and facilities. Major impacts would have a substantial influence on site operating costs, staff efficiency.

Duration

The duration of the impact considers whether the impact would occur for a short term and be temporary in nature, and associated with transitional types of activities, or if the impact would occur over a long term and/or have a permanent effect on site operations and facilities.

Type of Impact

Type of impact refers to whether the impacts on site operations and facilities would be beneficial or adverse. Beneficial impacts would improve site operations and/or facilities. Adverse impacts would negatively affect site operations and/or facilities and could hinder the site staff's ability to provide adequate services and facilities to visitors.

ALTERNATIVE 1

Analysis

Because no additional property would be acquired or leased, the house would continue to have insufficient space for tour groups, creating noise and disruptions that distract the staff. High demand for on-street parking would continue to result in inconveniences for staff and make access to the site difficult. This would result in moderate short-term adverse impacts over a long time. Also, adequate space for administrative functions would continue to be lacking, and the adaptive use of residential spaces results in inefficient office operations. Maintenance and upkeep of the council house would continue as funding permits and in response to structural deterioration, without a more proactive preservation plan. This would result in the continuation of moderate long-term adverse impacts.

The archival collections would remain in the carriage house. There would be no room for the storage of expected additional collections. Space for researchers and their work would continue to be inadequate. These conditions would continue to result in moderate long-term adverse impacts.

Because of the space, staff, and budget limitations, and the continuing conflicts

between administrative and visitor functions, the approach to managing the site, archives, and educational programs is more reactive, which decreases overall site operational efficiency.

Because alternative 1 would continue current management policies, there would be no change in site operations, staffing, and facilities, thus implementing this alternative would continue to have moderate long-term adverse impacts on operations.

Cumulative Impacts

No known cumulative impacts on site operations, staffing, and facilities would be expected. No projects or actions in or outside the historic site would combine with actions described in alternative 1 to result in cumulative impacts.

Conclusion

Implementing alternative 1 would have moderate long-term adverse impacts on site administration and operations. Conflicts resulting from incongruent uses and lack of space would continue. The lack of accessible access to the council and carriage houses would continue to limit access by mobility impaired employees and visitors. This violates NPS policies.

ALTERNATIVE 2 (PREFERRED)

Analysis

The purchase of the row house adjacent to the council house would double the space available for the administrative, visitor, and archive functions. The use of the adjacent house to provide an orientation and movie space for large groups and site administrative offices (upper floor) would separate the administrative and visitor functions while keeping the staff together. Orienting visitors

in the adjacent property would increase the carrying capacity of the house to about 180 people per day. Three existing parking spaces would be available on the alley for administrative use. Using the offsite space as a primary storage for the archives would leave the carriage house available for use as a research center.

The adjacent row house has a door from the sidewalk to the basement that could serve as an entrance for visitors and employees with mobility problems. Use of this row house would alleviate the need for making an entrance into the council house, which would have an adverse impact on the historic façades — one reason the Logan Circle Historic District was formed. The acquisition of the property, therefore, would provide long-term major benefits for administrative staff and researchers accessing the archives.

The additional space would also allow for increasing the size of the staff. This alternative proposes increasing the staff to 13 — which would include an assistant site manager, another ranger, a visitor use assistant, a museum educator/ curator, an additional archivist, an archival technician, and a maintenance worker. These additional staff members would have a major long-term beneficial impact on more efficient site operations and the staff's ability to provide enhanced visitor services compared to alternative 1. Moving the archives to the Museum Resource Center would decrease operational efficiency because staff would sometimes be required to retrieve archival materials from the center for researchers at the carriage house. In addition, the operating hours would be extended to seven days a week. The increased long-term costs would be a trade-off for the enhanced visitor services.

Doubling the square footage of the site would (presumably) double the maintenance and utility costs — a major long-term adverse impact. An additional full-time

maintenance worker would be added to handle the added work.

Cumulative Impacts

No known cumulative impacts on site operations, staffing, and facilities would be expected. No projects or actions onsite or offsite would combine with the action described in alternative 2 to result in cumulative impacts.

Conclusion

The primary functions of the site – the museum and archives – would receive major long-term benefits from implementing this alternative. They would both be able to expand into much-needed space. Orienting visitors in large groups in another structure would help decrease the level of wear and tear and maintenance for the council house.

Orientation, restrooms, book sales and other visitor services that do not relate to interpretation and education but create wear on the historic house would be moved to the new space. NPS staff would be provided with more space, and that space would be more conducive to work, free from noise and unavoidable intrusions from tours and visitors. Site operational efficiency would be increased, along with the staff's ability to provide visitor services. Operational efficiency for the archives would decrease slightly due to staff sometimes being required to retrieve archival materials from the center. However, staff would also benefit due to the additional space for processing collections. Three parking spaces for staff would be available in the alley.

With the acquisition of a new building, maintenance and utility costs would presumably double. Additional employees (seven) would mean a major long-term adverse impact on the site's budget but

would be offset by the long-term gain for visitors from the additional services provided.

ALTERNATIVE 3

Analysis

Acquiring or leasing space near the council house and expanding the existing carriage house would increase the space available for current functions and add an additional room for activities and workshops and seminars – a major long-term benefit in accommodating site functions.

Using the new area to provide space for orientation, a movie, and comfort stations for large groups would have a moderate long-term benefit on efficiency by making the process easier for site staff. It would also increase the carrying capacity of the house to 180 people per day (as in alternative 2). Using the new space for offices and the council house and carriage house for ranger staff and archival staff would cause a minor long-term adverse effect by segregating the staff by function, therefore adding some communication and operation impacts, less communication between functional groups, increased transportation time and costs between the buildings, and increased difficulty getting staff together for meetings. However, it would separate the administrative staff from the visitor functions, which would decrease visitor noise and interruptions for the staff working in the offices. If space is leased in a nearby office building, parking for staff and visitors could be provided, resulting in moderate long-term benefits.

The additional space allows for increasing the size of the staff. The composition of the staff is directed toward the additional function of setting up and coordinating programs. This alternative proposes increasing the staff to 14. This includes two rangers because the interpretive function

occurs in two locations, an assistant site manager, a program coordinator, a education specialist/curator, an additional secretary, a maintenance worker, and a visitor use assistant. These staff members would have a moderate long-term beneficial impact on site operational efficiency and the staff's ability to provide enhanced visitor services compared to alternative 1. Increased staff would provide more and varied programs, including outreach programs. Additional staff assigned to primarily administrative functions would provide other staff time for more in-depth research and program development.

Staff would need to be available for programs outside standard operating hours to accommodate workshops, lectures, and other programs. This would mean additional salary costs but would be offset by the opportunities provided to visitors.

Increasing the square footage of the site would have major long-term adverse impacts on site maintenance costs. The extent of the impact would be greatly affected by whether the new space is leased or acquired. The new services — workshops and seminars — would increase maintenance needed for setting up and cleaning up. A maintenance position would be added to handle the additional work.

Cumulative Impacts

No known cumulative impacts on site operations, staffing, and facilities would be expected. No projects or actions onsite or offsite would combine with actions described in alternative 3 to result in cumulative impacts.

Conclusion

Providing additional space for the archives and site administrative functions, and providing a new function, programs and

meetings, as well as space for that function would have moderate long-term beneficial impacts on site operations. Site operations would have the necessary space to function effectively. If space is leased in a nearby office, staff parking space might be available.

However, separating the staff into three locations would be a minor long-term adverse impact on site operations requiring more effort for communication.

With the acquisition of a new building, and new programs being given in it, maintenance and utility costs would increase. Additional employees (eight) would mean a moderate long-term impact on the site's budget but would be offset by the long-term gain for visitors because of the additional services provided.

ALTERNATIVE 4

Analysis

Accommodating the archives offsite in a professional archival facility (operated by leased and contracted operator) and demolishing the carriage house and reconstructing a building in its location would have a moderate long-term beneficial impact on site operations by providing additional space for site functions — offices, the bookstore, and restrooms. The cost of offsite archival storage would increase site operating costs. Access and parking would continue as they are now — a moderate long-term adverse impact. Carrying capacity for the house would continue as in the no-action alternative, which would continue to result in inadequate space for administrative functions and continued inefficient office operations.

Replacing the carriage house with a new facility would decrease maintenance and utility costs and increase energy efficiency. Construction of the new carriage house

could allow for the addition of one or two parking spaces. The new spaces would accommodate close accessible parking and parking for one NPS vehicle. This would provide a long-term minor beneficial impact.

Adding one additional ranger or visitor use assistant would have minor long-term adverse impacts on operating costs (which would be a trade-off for slightly increased operational efficiency and staff ability to provide increased visitor services compared to alternative 1).

Moving the archives offsite could have a moderate short-term adverse impact on researchers if they had to travel farther to reach that site or traveled to the council house not knowing that the archives had been moved offsite. In addition, more of the archivist's time would be used for research and interpreting files. Some of this lost time would be balanced by needing less time to maintain the archival collections, which would be maintained by a contractor. There would also be a long-term moderate adverse impact on the site's operating costs for leasing the archival storage facility.

Cumulative Impacts

No known cumulative impacts on site operations, staffing, and facilities would be expected through implementing this alternative. No projects or actions onsite or offsite would combine with the actions described in alternative 4 to result in cumulative impacts.

Conclusion

The implementation of alternative 4 would have minor to moderate long-term beneficial impacts on site operations by providing additional space for offices, the bookstore, and restrooms, allowing for more efficient functioning than alternative 1.

Maintenance of the facility that replaces the carriage house would be easier with sustainable modern plumbing, a modern heating and ventilation system, and modern electrical circuits. More of the archivists' time would be used for research and interpretation. Maintenance of the archives would be improved by contracting that service offsite. Visitor services and site administration would gain space and function more efficiently. The cost of offsite archival storage and the addition of one staff member would increase the site's operating costs but would be offset by the additional services provided.

The cost of offsite archival storage and the addition of one staff member would increase the site's operating costs but would be offset by the long-term gain for the protection of the archives, slightly more efficient site operations, and slightly enhanced staff ability to provide additional visitor services compared to alternative 1.

OTHER IMPACTS

UNAVOIDABLE ADVERSE EFFECTS

Unavoidable adverse impacts are those impacts that cannot be fully mitigated or avoided.

Alternative 1

Unless the funds became available to upgrade the carriage house, the inability to expand, process, and preserve the archives for research use would continue to pose major cultural resource management issues for NPS management into the future and would have moderate to major long-term adverse impacts on the expansion, preservation, and use of the collections

Staffing numbers at their current level and physical limitations of the house would continue to result in long-term moderate adverse impacts on visitors' opportunities to experience in-depth the stories of Dr. Bethune and the council house.

Parking limitations, lack of accessibility for visitors with disabilities, inadequate restroom facilities, and inadequate space to handle groups would continue to have long-term major adverse impacts on the visitor experience.

The lack of space for visitors and offices would result in the continuation of moderate to major long-term adverse impacts.

Because alternative 1 would continue current management policies, there would be no change in site operations, staffing, and facilities; thus, implementing this alternative would continue to have moderate long-term adverse impacts on operations.

Alternative 2

Implementation of this alternative would be expected to have minor long-term adverse impacts on the council house and adjacent historic property due to the addition of doorways to the council house and an elevator and doorways in the adjacent property.

Lack of parking space would have a long-term moderate adverse impact on visitors who arrive by private automobile.

Increasing the square footage of the site would (presumably) double the maintenance and utility costs – a major long-term adverse impact.

Construction activities could have short-term impacts on drivers using the alley behind the council house. Unavoidable inconveniences such as construction vehicles blocking access to some residences and businesses along the alley would result in temporary delays and possible traffic congestion. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

Implementing alternative 2 would likely displace one or more occupants in a structure. The relocation would be a short-term major disruption to those having to move.

Alternative 3

Enlarging the carriage house could have a major long-term adverse effect on the structure because its architectural values could be lost.

Implementing alternative 3 would have a moderate adverse impact on visitors who were expecting a traditional house tour and a moderate beneficial impact on visitors or community members involved in special workshops or programs.

Construction activities would have the same short-term adverse impacts as alternative 2 on neighborhood traffic, with unavoidable delays and possible traffic congestion. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

Adverse impacts would be short-term and minor to those area-dependent businesses that would be able to relocate within the same neighborhood. It is possible that the impact could become long term if the business relocates to an inconvenient site that results in the loss of a major portion of the customer base. Customers might experience minor long-term adverse impacts such as the inconvenience of requiring more time to travel to more distant locations.

Some lifestyle and social changes might result from visitors walking or otherwise traveling between the council house and a nearby property, particularly with respect to neighborhood residents. Potential impacts might include a loss of privacy for neighbors and possible trespass by visitors. However, because of the urban character of the area, the magnitude of these adverse changes would be anticipated to be short-term and minor.

Using the new space for offices and the council house and carriage house for ranger staff and archival staff would cause a minor long-term adverse effect by segregating the staff by function; therefore, adding some communication and operation impacts, less communication between functional groups, increased transportation time and costs

between the buildings, and increase difficulty getting staff together for meetings.

Increasing the square footage of the site would have major long-term adverse impacts on site operating and utility costs. The extent of the impact would be greatly affected by whether the new space is leased or acquired. The new services – workshops and seminars – would increase maintenance needed for setting up and cleaning up. A maintenance position would be added to handle the additional work.

Alternative 4

Demolition of the carriage house and its replacement with a modern structure would constitute a major long-term adverse effect on a historic property and on any remaining architectural features of the carriage house and the landscape.

The installation of an elevator at the rear of the council house would result in some minor long-term adverse impacts on the structure, but the building's documented architectural values that contribute to its listing on the National Register of Historic Places would not be affected.

Construction activities would have the same short-term adverse impacts as alternatives 2 and 3 on neighborhood traffic with unavoidable delays and possible traffic congestion. An increase in ambient noise and a sense of loss of privacy for residents would likely occur in the immediate neighborhood as a result of construction activities. Inconveniences and noise would be temporary, and adverse impacts would be minor.

The new structure would be compatible with the architectural style of the council house. Structure and landscape treatments vary behind nearby row houses. None of these changes would be visible from the street (because the council house is a row house).

Only people using the alley and the two adjacent neighbors would be impacted. Implementing alternative 4 would result in long-term minor adverse impacts on visual resources from within and outside the historic district.

Changing land use from commercial to public would have negligible impacts, whereas changing land use from residential to public would be a minor impact. Depending on the existing land use mix and specific neighborhood, this impact could be adverse or beneficial.

Moving the archives offsite could have a moderate short-term adverse impact on researchers if they had to travel farther to reach that site or traveled to the council house not knowing that the archives had been moved offsite. In addition, more of the archivist's time would be used for research and interpreting files. There would also be an adverse long-term moderate impact on the site's operating costs for leasing the archival storage facility.

Separating the staff into three locations would be a minor long-term adverse impact on site operations, requiring more effort for communication.

Parking space would be as difficult to find as in alternative 1 for visitors arriving by private automobiles, resulting in a long-term moderate adverse impact.

Limited staff numbers would result in moderate long-term adverse impacts on visitors' opportunities to experience the site and understand its stories.

Adding one additional ranger or visitor use assistant would have minor long-term adverse impacts on operating costs.

RELATIONSHIP OF SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

This section discusses the effects of the short-term use of resources resulting from implementing each alternative on the long-term productivity of resources at the national historic site.

Alternative 1

The continuation of current management trends, including the absence of a historic structure report and cyclic maintenance preservation program, as well as possible increases in visitation, would jeopardize the long-term protection/ preservation of the historic buildings, landscape, and historic furnishings/ artifacts at the national historic site. Current management trends could also jeopardize future acquisition and expansion of the site's historic furnishings/ artifacts and archival collections.

Providing a dehumidifier, a vapor barrier, insulation, and a fire protection system in the carriage house would provide enhanced environmental archival preservation standards for the archives and would be a long-term benefit for the archival collections in the carriage house.

Alternative 2

Improving the management of the cultural resources at the historic site, as provided in the preferred alternative, would contribute to their long-term protection and preservation. Preparing a historic structure report and establishing an enhanced cyclic maintenance preservation program would enhance protection of the documented historic architectural values of the council house and the carriage house. The separation of functions between the council house and the adjacent row house would afford better

protection of the council house's historic fabric and enhance visitor experience at the site. Improved maintenance of the landscape, supported by the preparation of a cultural landscape report and a cultural landscape preservation plan, would protect significant elements of the site's historic designed landscape.

The acquisition, preservation, and use of historic furnishings and artifacts as permanent, semipermanent, or traveling exhibits would be enhanced as a result of preparing an exhibit plan and a historic furnishings plan.

Renovating the carriage house interior, within the constraints of historic structural considerations and local zoning ordinances, would provide a modern state-of-the-art archival/ research repository that meets modern professional archival standards and would help ensure the long-term protection of the archival collections.

Alternative 3

The documented architectural values of the council house would be preserved as described in alternative 2. The emphasis on activist programs, expanded traveling exhibits, and offsite programs would potentially limit the number of persons visiting the site. Many people would learn the story offsite. Offsite visitors would learn the story, exhibits, and possibly a video at the orientation center, but may not have time to visit the historic house. This would afford increased long-term protection to the historic fabric of the council house.

Although protection and preservation of the archival collections would be the same as described in alternative 2, facilities for the expansion, processing, preservation, and use of the archival collections under this alternative would be provided onsite by expanding the carriage house to provide space for a modern state-of-the-art archival

facility. Thus, actions under this alternative could result in the further long-term loss of the carriage house's architectural integrity. Redesign of the current landscape to accommodate accessible entry to the buildings and to make it compatible with those of surrounding neighborhood properties could result in the long-term loss of significant elements of the site's historic designed landscape. Because historic furnishings and artifacts would primarily be used in traveling exhibits and outreach programs, their display in the council house would be minimized, thus removing such objects from their historic context and negatively affecting their onsite interpretive value on a short-term basis.

Alternative 4

Actions under this alternative would have the same beneficial effects on the council house as described in alternatives 2 and 3. However, under this alternative the carriage house would be demolished and replaced by a modern building, thus resulting in the removal and long-term loss of a historic structure.

Actions for acquiring, processing, preserving, and using the archival collections would have the same beneficial effects as those described in alternative 3, although the management of the collections would be transferred offsite via contract to a professional archival/research repository.

The acquisition, preservation, and use of historic furnishing pieces and artifacts throughout the council house would be improved, enabling the structure to serve as an authentic historic house museum. Thus, this alternative would provide for the greatest degree of preserving historic furnishings and artifacts and of interpreting them within their historic context.

The historic designed landscape would be restored and maintained as recommended

by a cultural landscape report and a cultural landscape preservation plan. Thus, this alternative would provide for the greatest degree of preserving the historic designed landscape.

IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES

An irreversible commitment of resources is one that cannot be changed once it occurs except perhaps in the extreme long term — for example, the loss of character-defining features such as the loss of a building's façade. An irretrievable commitment means the resource is lost for a period of time and likely cannot be recovered or reused — for example adding another story to a historic structure.

Alternative 1

The lack of a comprehensive preservation maintenance program for the council house and the carriage house, as well as increased visitation to the site, could result in the loss of historic fabric and structural deterioration, thus resulting in the loss of the buildings' historic integrity and an irretrievable commitment of resources. The lack of a cultural landscape report and a cultural landscape plan could result in the loss of significant elements of the site's historic designed landscape and an irretrievable commitment of resources.

Alternative 2

Renovating the carriage house would require commitments of small amounts of building materials. These resources are not in short supply, and their use would not have an adverse effect on the availability of these resources.

Alternative 3

Enlarging and developing the carriage house into a modern archival facility could have a major adverse effect on the

structure's documented architectural values. Redesign of the current landscape to accommodate accessible entry to the buildings and to make it compatible with those of surrounding neighborhood properties could result in the loss of significant elements of the site's historic designed landscape. Thus, these actions could be irreversible commitments of resources. Also, enlarging and developing the carriage house would require the commitment of building materials.

Alternative 4

Replacing the carriage house with a modern building would result in an irreversible commitment of resources. This would result in the loss of the historic attributes of the structure. Building a new building would require a commitment of building materials. These resources are not in short supply, and their use would not have an adverse effect on the availability of these resources.

IMPACTS ON ENERGY REQUIREMENTS AND CONSERVATION POTENTIAL

Limited amounts of nonrenewable resources would be used for construction projects, including rehabilitation/ preservation of the buildings and landscape (alternatives 1-4), expansion of the carriage house (alternative 3), and demolition and replacement of the carriage house (alternative 4). This expenditure of energy would be short term and negligible and include fuel for construction vehicles, construction materials, and energy used in manufacturing materials.

A temporary increase in energy expenditure would occur if the archival collections were moved to an offsite repository. The increase would result from the transfer of the collections as well as staff and researcher transportation between the national historic site and the offsite facility.

CONSULTATION AND COORDINATION

SCOPING AND OTHER PUBLIC INVOLVEMENT EFFORTS

The National Park Service completed the scoping phase through a public involvement effort, including three public meetings and two newsletters requesting comments regarding the future of the site. During the period from February to June, 1998, public meetings were held in Washington, D.C., Chicago, Illinois, and Daytona Beach, Florida. After mailing out a newsletter that described the draft alternatives, an open house was held in December 1999 to receive public comments on these draft alternatives.

Public comments were given at the public meetings, and letters and Internet messages were received in response to the newsletters. All comments given in response to the scoping process have been considered and will remain in the administrative record throughout the planning process. A summary and listing of the public comments are available to the public and can be obtained through the site manager.

In consideration of public responses during the scoping for this project, the planning team determined that the following things were to be considered in developing the alternatives:

For All Alternatives

- Encourage visitor participation and feedback.
- It is important to have a place where African American women's history is collected.
- The limited history of African American women's accomplishments points out the need of having a place where African American women's history is

collected and made available for researchers.

- Encourage our kids to see what has happened in the past.

Potential Elements for Some Alternatives

- Use the house as a teaching mechanism. (Alternatives provide different approaches.)
- People living nearby do not know about the site; there needs to be more community outreach. (Alternatives provide different approaches.)
- Broaden the thinking of the surrounding community, talk about the Shaw district, Black Washington, broad interpretation: bring out the history of the city, not the national city, the local city (Alternatives provide different approaches to broad interpretive concepts. Comprehensive Interpretive Plan determines details.)
- Spread the information on the council house throughout the nation. Sending brochures to churches will help encourage visits. (Alternatives provide different approaches.)
- Establish partnerships with other African American conventions/organizations nationwide and with churches, colleges, and associations. (Alternatives provide different approaches.)
- Acquire the property next to the site to allow for expansion, accessibility, and archives. (Alternatives provide different approaches.)
- Put organizations' records in one place. (Alternatives provide different approaches.)
- Raise consciousness in the African American community of the importance of and need for preserving materials. (Alternatives provide different approaches.)
- Move archives to another building that is centrally located or purchase adjacent

building for archives. (Alternatives provide different approaches.)

- Increase space for researchers. (Alternatives provided different approaches.)

A *Federal Register* notice and media announcements initiated the beginning of a formal public comment period on this draft plan. All interested agencies, groups, and individuals are invited to review the document and submit comments.

Public meetings on the draft plan will be held if issues raised by this document warrant them.

Consultation

During development of this *Final General Management Plan*, the National Park Service consulted on a regular basis with the historic site's Federal Advisory Commission. This commission appointed four representatives who have participated and will continue to participate as members of the project planning team and serving as liaison with other members of the advisory commission. The full commission reviewed elements of the plan as they were drafted and provided review comments on the draft plan.

In accordance with Section IV of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation

Officers, certain undertakings require only internal NPS review for Section 106 purposes (see table 5). Other undertakings require standard Section 106 review in accordance with 36 CFR 800, and in those instances the National Park Service consults as necessary with the State Historic Preservation Office, the Advisory Council on Historic Preservation, and other interested parties.

Coordination

The *Final General Management Plan / Environmental Impact Statement* has been developed pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 (Public Law 91-190) and the Council on Environmental Quality regulations (40 CFR 1508.22). The intent of this planning process is to prepare a general management plan that discusses protection and enhancement of the values for which Mary McLeod Bethune Council House National Historic Site was authorized as a unit of the national park system. During the planning process, management alternatives have been developed that address cultural resource protection, visitor experience at the site, and limitations of site facilities. Through scoping and the public comment review process, the planning process was conducted with other federal agencies, state and local governments, and interested organizations and individuals.

TABLE 5. CULTURAL RESOURCE COMPLIANCE WITH SECTION 106

Actions programmatically excluded from Section 106 review outside the National Park Service	Actions requiring consultation with the State Historic Preservation Office during project design development
<p>Preservation/maintenance treatment of structures in accordance with <i>The Secretary of the Interior's Standards for the Treatment of Historic Properties</i> (exclusion IV.B.1)</p> <p>Preservation/maintenance treatment of landscape in accordance with <i>The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes</i> (exclusion IV.B.2)</p> <p>Preservation/maintenance treatment of historic furnishings/artifacts in accordance with National Park Service <i>Standards for NPS Museum Collections Management</i>, Director's Order No. 24, and <i>National Park Service Museum Handbook</i>, Part 1 (exclusion IV.B.1)</p> <p>Rehabilitation of landscape (exclusion IV.B.9)</p>	<p>Elevator added to adjacent structure; addition of doorways on each floor of council house to provide access from elevator</p> <p>Installation of elevator at rear of council house</p> <p>Enlargement of carriage house</p> <p>Demolition of carriage house</p> <p>Redesign of extant landscape</p>

LIST OF AGENCIES AND ORGANIZATIONS RECEIVING A COPY OF THIS FINAL MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

An * indicates that a comment on the draft plan was received from this agency or organization.

Federal Agencies

Advisory Council on Historic Preservation
Environmental Protection Agency*
Maggie L. Walker National Historic Site
Women's Rights National Historic Site

Congressional Representatives

Eleanor Holmes Norton

State Agencies

State Historic Preservation Office

Local Agencies

Advisory Neighborhood Commission

Organizations

Ad Hoc Labor Committee
African American Civil War Memorial
African American Heritage Pre. Fd.
Alpha Kappa Alpha Sorority, Inc
American Federal of Teachers
Amistad Research Center, Tulane University
Association for the Study of African-American Life and History
Association of African American Museums
Association of Black Women Historians
Bethune-Cookman College
Bethune Museum & Archives, Inc
Black Fashion Museum
Black Leadership Forum
Capital Hill Restoration Society
Charles Sumner School Museum
Charlotte Hawkins Brown Historic Site
Chi Eta Phi Sorority
Children's Defense Fund
Chums, Inc
Continental Societies
DC Heritage Tourism Coalition
DC Preservation League
Delicados, Inc

Delta Sigma Theta Sorority, Inc
Downtown DC Business Improvement
District
Dupont Kalorama Museum Consortium
E Morris Communications, Inc
Eta Phi Beta Sorority
Friends of Lincoln Park
Gamma Phi Delta Sorority
Grand Temple Daughters of Elks
Historic House Museums Consortium of
Metropolitan Washington, DC
Historical Society of Washington, D.C.
Iota Phi Lambda Sorority, Inc
Ladies Auxiliary
Lamba Kappa Mu Sorority
Las Amigas, Inc
Lawyers Committee for Civil Rights
Leadership Conference on Civil Rights
Les Gemmes, Inc
Logan Circle Community Association
Manna Comm. Development Corp.
Mary McLeod Bethune Family Legacy
Mary McLeod Bethune Foundation,
Bethune-Cookman College
Mary McLeod Bethune Institute
Moorland Springarn Research Center,
Howard University
Mount Olivet Evangelical Lutheran Church
N Street Village
National Association of Colored Women's
Clubs
National Association of Negro Business &
Professional Women's Clubs, Inc
National Association of University Women
National Black Nurses Association

National Council of Churches
National Council of Negro Women, Inc
National Guard Chapter
National Humanities Center
National Medical Association,
Fleming Auxiliary
National Sorority of Phi Delta Kappa
National Women of Achievement
National Women's History Project
Pratt Library
Pi Inucub Rho Omega Sorority
Radcliffe Institute for Advanced Study
Schlesinger Library, Radcliffe College
SCLC Women
Schomburg Center for Research in Black
Culture
Sewall-Belmont House
Sigma Gamma Rho Sorority
Tau Gamma Delta Sorority
The Charmettes, Inc
The Women's Convention
Thurgood Marshall Trust for Service and
Heritage
Top Ladies of Distinction
Trade Union Women of African American
Heritage
Twinks Social & Civil Club
United Negro College Fund
Women Lawyers Division
Woman's Home & Overseas Miss.
Women's Missionary Council
Women's Missionary Society
Zeta Phi Beta Sorority

RESPONSES TO COMMENTS ON THE DRAFT PLAN

The National Park Service received 18 comments on the *Draft Mary McLeod Bethune Council House National Historic Site General Management Plan / Environmental Impact Statement*. One was from the federal advisory commission, one of the comments was from a federal agency, and sixteen comments were received from individuals.

The Council on Environmental Quality (1978) guidelines for implementing the National Environmental Policy Act require the National Park Service to respond to "substantive" comments." A comment is substantive if it meets any of the following criteria from Director's Order 12, "Conservation Planning and Environmental Impact Analysis" (NPS 1999).

- It questions, with reasonable basis, the accuracy of information.
- It questions, with reasonable basis, the adequacy of environmental analysis.
- It presented reasonable alternatives other than those proposed in the plan.
- It would cause changes or revisions in the preferred alternative.

Many of the comments expressed an opinion on the alternatives presented in the document. One individual expressed a preference for the Alternative 1, No-Action; one individual expressed a preference for Alternative 3, Emphasis on Activities and Programs, and one individual preferred Alternative 4, Emphasis on Museum. Twelve individuals indicated their preference for Alternative 2, Dual Emphasis, the preferred alternative. Additional comments within letters received had ideas that were outside the scope of the management plan / environmental impact statement. The National Park Service values this input and where applicable it will be taken into account in future plans. However, no response is provided to such comments in this document.

Photocopies of the letter from the agency and the federal advisory commission follow. The federal advisory commission requested minor changes to the document, and the responses to them are provided.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

OCT 22 2001

Ms. Terri Urbanowski
National Park Service PDS
P.O. Box 25287
Denver, Colorado 80225-0287

Re: Mary McLeod Bethune Council House, Washington, D.C.
Draft General Management Plan/ Environmental Impact Statement

Dear Ms. Urbanowski:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. Based on our review, we have assigned a rating of "LO-1", Lack of Objections, Adequate Information (see enclosed EPA EIS Rating System). EPA concurs with the selection of Alternative 2 as the preferred alternative.

In the future, please provide us with a notice that the EIS is available in electronic format on your website. EPA supports the "paperless office" initiative, but we do require notice that the document will be provided to the regional office in that manner. Please provide a written notice at the above address for the attention of the NEPA/404 Coordinator (3ES30). An e-mail notice would also be accepted. Please address your notice to messiah.margaret@epa.gov.

Thank you for providing EPA with the opportunity to review this project. If you have any questions regarding our comments, please feel free to contact Ms. Denise M. Rigney at (215)814-2726.

Sincerely,

A handwritten signature in black ink, reading "Thomas A. Slenkamp". The signature is fluid and cursive.

Thomas A. Slenkamp, Acting Director
Office of Environmental Programs

Enclosure



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Responses to the Commission's Letter

I. Language regarding archival research, processing, and collections has been changed.

No response was made regarding interpretation because it would be inconsistent with the description in the section that describes the alternatives.

Language regarding African-American women's history was added to alternative 3 in the "Alternatives, Including the Preferred Alternative" section.

II.

Comments A, B, and C. Text has been added to the document to address these concerns.

III. Text has been added to the document to address oral history interpretation.

IV.

Comment A. Language was added to consider parking enhancements.

Comment B. Requested changes were covered by changes made in II above.

Comment C. This request is not in the scope of this general management plan.

Comment D. Language has been changed/added to address this comment.

Comment E. This request is not in the scope of this general management plan.

Comment F. Language has been changed/added to address this comment.

V. Requested changes were covered by changes made in II above.

VII. Language has been changed/added to address this comment.

VIII. Language has been changed/added to address this comment.

IV. Language has been changed/added to address this comment.

VI. Requested changes were covered by changes made in II above.

IX. Language has been changed/added to address this comment.

September 21, 2001

Memorandum

To: Terri Urbanowski, General Management Plan Team Captain

From: Mary McLeod Bethune Council House Federal Advisory Commission

Subject: Draft, GMP/Environmental Impact Statement

Mary McLeod Bethune Council House NHS Federal Advisory Commission
General Management Plan Meeting Notes
August 13, 2001 and August 14, 2001

The Mary McLeod Bethune Council House National Historic Site adds its strong support for Alternative #2 and recommends the following embellishments to the Draft General Management Plan.

I. Draft GMP p. iii, Paragraph 2, Alternative #2:

~~The interpretation program would be broad and balanced and would provide more in-depth treatment of Dr. Bethune's role as a public figure and organizer.~~

Archival research and processing would be concentrated on site. Where necessary, some archival collections could be moved to the Museum Resource Center for preservation and storage purposes. The interpretation program would be on site, through outreach sessions, and employ state-of-the-art communications technology. The program would provide in depth treatment of African-American women's history and Dr. Bethune's role in it. The program would emphasize Dr. Bethune's impact on American and African-American history, in particular as a public figure and organizer.

Both Alternatives 3 & 4:

In keeping with the enabling legislation, Alternatives 3 & 4 must include references to the status of the archives, museum and African-American women's history. (Also see p. iii, pp. 35-40 and Tables 3, 4).

- II. Virtual Component:
 - A. Alternative #2 must include a virtual component.
 - B. The list of cultural resources must include outreach, educational programs and electronic media.
 - C. Visitor Use and Experience should be expanded to include outreach and virtual programs for a broad range of publics.
- III. Oral History Interpretation Need to be Added to Alternative #2:
- IV. Alternative #2, Page 32:
 - A. Consider parking enhancement.
 - B. Add virtual component as started in II.
 - C. Additional consideration of economic development in the area.
- D. Page 34, Column 2, First Paragraph:

Space would also be provided for the expanded archival staff and to accommodate some processing of archival collections.

Page 34, Column 2, Final Paragraph:
~~The primary storage for archival collections and the major archival processing area would move to the state of the art storage facility, the Museum Resource Center.~~
- Substitute following Language:

Archival research and processing would be concentrated on site. Where necessary, some archival collections could be moved to the Museum Resource Center for preservation and storage purposes.
- E. Evaluation of visitor statistics should include on site visitors, outreach participants, and virtual visitors.
- F. Staffing needs clearer elaboration of duties and skills, some of which may be subject to external contract.
 - 1. Job credentials should include web/educational technology skills.
 - 2. Positions: Keep the same number of positions and reflect the resource needs including:
 - Historian of African-American women's history (new position).
 - Museum educator (separate position)
 - Museum curator (separate position)

Delete:

— Maintenance worker

- V. p. 32: Improve Visitor Experience:
— create a dynamic virtual presence.

- VII: p. 32, Second Column, Paragraph 3:
"Enhance educational and interpretative outreach programs (scholars, schools, teachers, and community groups.)
— Insure oral history component

- VIII. p. 32: Second Paragraph:
Add working on parking problems with other area groups and include directions and alternatives on the web site.

- IV. p.33: Floor plan of building #2:
The second floor area designated as exhibit space should be converted to "archival support area."

- VI. p. 34: Add Block "Virtual Interpretive Space:"
The Bethune project will help to pilot new interpretative methods to both expand the visitors' experience across the globe and preserve the cultural resources. This new space would include multi-media, educational resources, and help to provide additional access to a physically limited space. Delivery could be over the *world wide web* through *CD's*, *DVD's* or other media, and at site terminals.

- IX. p. 68: Notes confusion on the historic resource study which does not include preservation and maintenance components.

APPENDIXES

SELECTED REFERENCES, PREPARERS, INDEX

APPENDIX A: PUBLIC LAWS AND REPORTS RELATED TO THE SITE

PUBLIC LAW 97-329—OCT 15, 1982

96 STAT 1615

Public Law 97-329
97th Congress

An Act

To designate the Mary McLeod Bethune Council House in Washington, District of Columbia, as a national historic site, and for other purposes

Oct. 15, 1982
[S. 24.86]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled.

CONGRESSIONAL FINDINGS AND PURPOSE

SECTION 1 (a) FINDINGS.—The Congress finds and declares that—

(1) the Mary McLeod Bethune Council House was the residence in Washington, District of Columbia, of Mary McLeod Bethune, renowned educator, national political leader, and founder of the National Council of Negro Women;

(2) it was at this location that Mary McLeod Bethune directed activities that brought her national and international recognition;

(3) this site was significant as a center for the development of strategies and programs which advanced the interests of black women and the black community;

(4) it was at this location that Mary McLeod Bethune as the president of the National Council of Negro Women received heads of state, government officials, and leaders from across the world;

(5) the Mary McLeod Bethune Council House was the first national headquarters of the National Council of Negro Women, and is the site of the Mary McLeod Bethune Memorial Museum and the National Archives for Black Women's History;

(6) the archives, which houses the largest extant manuscript collection of materials pertaining to black women and their organizations, contains extensive correspondence, photographs, and memorabilia relating to Mary McLeod Bethune; and

(7) the museum and archives actively collect artifacts, clothing, artwork, and other materials which document the history of black women and the black community.

(b) PURPOSE.—It is the purpose of this Act—

(1) to assure the preservation, maintenance, and interpretation of this house and site because of the historic meaning and prominence of the life and achievements of Mary McLeod Bethune, an outstanding leader in the areas of housing, employment, civil rights, and women's rights; and

(2) to assure the continuation of the Mary McLeod Bethune Memorial Museum and the National Archives for Black

Mary McLeod
Bethune
Council House,
D.C.
National historic
site, designation
in 1982 (S. 24.86)

96 STAT. 1616

PUBLIC LAW 97-329—OCT. 15, 1982

Women's History at this site, the preservation of which is necessary for the continued interpretation of the history of black women in America.

ESTABLISHMENT OF HISTORIC SITE

SEC. 2. In order to further the purpose of this Act and the Act of August 21, 1935 (16 U.S.C. 461-7), the Mary McLeod Bethune Council House at 1318 Vermont Avenue Northwest, in the city of Washington, District of Columbia, is hereby designated as a national historic site (hereinafter in this Act referred to as the "historic site").

COOPERATIVE AGREEMENT

SEC. 3. In furtherance of the purposes of this Act and the Act of August 21, 1935 (16 U.S.C. 461-7), the Secretary of the Interior is authorized and directed to enter into cooperative agreements with the National Council of Negro Women. Such agreements may include provisions by which the Secretary will provide technical assistance to mark, restore, interpret, operate, and maintain the historic site and may also include provisions by which the Secretary will provide financial assistance to mark, interpret, and restore the historic site (including the making of preservation-related capital improvements and repairs but not including other routine operations). Such agreement may also contain provisions that—

(1) the Secretary of the Interior, acting through the National Park Service, shall have right of access at all reasonable times to all public portions of the property covered by such agreement for the purpose of conducting visitors through such properties and interpreting them to the public; and

(2) no changes or alterations shall be made in such properties except by mutual agreement between the Secretary and the other parties to such agreements.

No limitation or control of any kind over the use of such properties customarily used for the purposes of the National Council of Negro Women shall be imposed by any such agreement.

ANNUAL REPORT

SEC. 4. The National Council of Negro Women shall, as a condition of the receipt of any assistance under this Act, provide to the Secretary of the Interior and to the Congress of the United States an annual report documenting the activities and expenditures for which any such assistance was used during the preceding fiscal year.

SEC. 5. Beginning after September 30, 1983, there is authorized to be appropriated \$100,000 to provide financial assistance under section 3 of this Act. There is also authorized to be appropriated for purposes of making grants to the National Council of Negro Women

Appropriation
Authorization

PUBLIC LAW 97-329—OCT. 15, 1982

96 STAT. 1617

for purposes of this Act an additional \$100,000 to be provided, as may be agreed to by the Secretary of the Interior and the National Council, on a fifty-fifty matching basis to the extent that funds or services are contributed by the National Council for such purposes. Sums authorized to be appropriated under this section shall remain available until expended.

Approved October 15, 1982

LEGISLATIVE HISTORY—S 2436

SENATE REPORT: No. 97-534 (Committee on Energy and Natural Resources)
CONGRESSIONAL RECORD, Vol. 128 (1982):

Sept. 22, considered and passed Senate
Sept. 30, considered and passed House

WEEKLY COMPILATION OF PRESIDENTIAL DOCUMENTS, Vol. 18, No. 41 (1982)
Oct. 15, Presidential statement

AUTHORIZING THE NATIONAL PARK SERVICE TO ACQUIRE AND MANAGE
THE MARY McLEOD BETHUNE COUNCIL HOUSE NATIONAL HISTORIC
SITE AND FOR OTHER PURPOSES

APRIL 22, 1991 —Committed to the Committee of the Whole House on the State of
the Union and ordered to be printed

Mr. MILLER of California, from the Committee on Interior and
Insular Affairs, submitted the following

REPORT

[To accompany H.R. 690]

(Including the cost estimate of the Congressional Budget Office)

The Committee on Interior and Insular Affairs, to whom was referred the bill (H.R. 690) to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site, and for other purposes, having considered the same, report favorably thereon with amendments and recommend that the bill as amended do pass.

The amendments are as follows:

1. Page 3, line 24, after "participate" insert "in an advisory capacity".
2. Page 4, line 12, insert "for 4-year terms" after "Secretary".
3. Page 4, in lines 13, 16, and 19, strike "for terms of 4 years".
4. Page 4, beginning in line 16, strike "who represent" and insert "from recommendations submitted by".
5. Page 4, line 22, strike "appointed for terms of 4 years".
6. Page 5, in line 1, strike "appointed for terms of 4 years".
7. Page 5, in line 4, strike "appointed for terms of 4 years who" and insert "who shall".
8. Page 5, line 6, strike "appointed for a term of 4 years".
9. Page 6, line 2, strike "(Act of October 6, 1972, 86 Stat. 776)" and insert "(5 U.S.C. Appendix)".

INTRODUCTION

The Committee adopted amendments en bloc to H.R. 690. The provisions of the bill and the amendments are described in detail in the "Section-By-Section Analysis" section of this Report.

PURPOSE

The purpose of H.R. 690¹ is to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site as a unit of the National Park System.

BACKGROUND AND NEED

Mary McLeod Bethune (1875-1955) was a distinguished African American educator, political activist and leader. She devoted her life to championing the causes of African American women. Born in South Carolina of parents who had been slaves before Emancipation, Bethune became a teacher. In 1904, she opened the Daytona Normal and Industrial Institute in Florida, which became Bethune-Cookman College in 1929. Bethune remained President of the college until 1942.

She founded the National Council of Negro Women which united the major African American women's organizations into a national organization in 1935. Bethune was President of the National Council of Negro Women until 1949 and represented that organization at the founding of the United Nations.

In 1935 she was appointed to the National Advisory Committee to the National Youth Administration. From that position she exerted major influence on the Roosevelt administration on behalf of blacks. Bethune influenced her friend Eleanor Roosevelt to work on behalf of African Americans. She organized the Federal Council on Negro Affairs to bring together blacks in government. Bethune worked diligently for civil rights. Her legacy continues in the organization of the National Council of Negro Women.

Bethune's house, located at 1318 Vermont Avenue, Washington, D.C., was built in 1876 in the Second Empire style. Mrs. Bethune lived there from 1943 until 1949 and used it as her headquarters from 1943 until her death in 1955.

The Bethune Museum and Archives opened in 1979. In 1982 it was designated as a National Historic Site. Since that time it has regularly received Congressional appropriations. The Bethune Museum and Archives has held exhibitions on African American women's history and culture, held lecture and concert series, and provided a reference service and educational publications. The National Archives for Black Women's History has approximately 800 linear feet of records on the history of African American women, with an emphasis on twentieth century archival records.

¹ H.R. 690 was introduced on January 29, 1991 by Mr. Lewis of Georgia (for himself, Mr. Miller of California, Mr. Vento, Mr. de Lugo, Mr. AuCoin, Mr. Feather, Mr. Flake, Mr. Rangel, Mr. Mfume, Mrs. Collins of Illinois, Mr. Owens of New York, Mr. Bellums, Mr. Espy, Mr. Siskos, Mr. Towns, Mr. DeFazio, Mr. Richardson, Mr. Murphy, Mr. Lehman of Florida, Mr. Jontz, Mr. Pascelt, Mr. Parker, Mr. Palm, Mr. Studds, Mr. Durbin, Mr. Frost, Mr. Berman, Mr. F. Geomevanga, Mr. Walsh, Mr. Gordon, Mr. Serrano, and Mr. Hatcher.

SECTION-BY-SECTION ANALYSIS

Section 1 provides that the purposes of the Act are to preserve and interpret the life and work of Mary McLeod Bethune; the history, lives and contributions of African American Women; and the struggle for civil rights. The Committee intends that the Mary McLeod Bethune Council House National Historic Site interpret the life and accomplishments of Mrs. Bethune in their larger historical context including efforts for civil rights.

Section 2 authorizes the Secretary of the Interior to acquire the property designated as the Mary McLeod Bethune Council House National Historic Site, located at 1318 Vermont Avenue, N.W., Washington, D.C. together with such structures and improvements thereon and such personal property associated with the site as he deems appropriate for interpretation of the site. The Committee notes that the National Archives for Black Women's History is included in this authorization. The Committee would prefer a donation of the archives in recognition of the federal funding it has received. The National Park Service's previous contributions to capital improvements to the property should be considered in negotiating the final purchase price.

Section 3(a) directs the Secretary, upon acquisition of the property, to administer the Mary McLeod Bethune Council House National Historic Site in accordance with the legislation generally pertaining to the National Park System. It terminates the cooperative agreement referred to in section 3 of the Act of October 15, 1982 (Public Law 97-329). The Committee recognizes the National Park Service's expertise and experience in administering historic sites such as this one, and directs the National Park Service to manage the historical site, including its interpretation and preservation. The Committee understands that the period of the site's historic significance is 1943 to 1955, when the site was used by Mrs. Bethune and the Council as the organization's national headquarters.

Section 3(b)(1) authorizes and directs the Secretary to enter into a cooperative agreement with non-profit organizations dedicated to preserving and interpreting the history of the life and work of Mary McLeod Bethune and the history and contributions of African women to provide programs, seminars and lectures. The Secretary is also authorized and directed to enter into a cooperative agreement for the administration of the archives currently located at the historic site. The Committee intends that the archives may continue to collect pertinent materials on the individuals, organizations and events associated with Mary McLeod Bethune and her contemporaries.

Section 3(b)(2) authorizes the Secretary to provide space and administrative support. The Committee intends that the administrative support shall be limited to that agreed upon by the National Park Service and such organizations.

Section 3(c) directs that the historic site shall be operated and managed in accordance with a General Management Plan, with the Advisory Commission fully participating in an advisory capacity in the development of the General Management Plan. The Secretary and the Advisory Commission shall meet and consult on matters relating to the management and development of the historic site.

Section 4(a) establishes the Mary McLeod Bethune Council House National Historic Site Advisory Commission (hereinafter referred to as the "Commission").

Section 4(b) specifies the membership and terms of the Commission.

Section 4(c) directs that members of the Commission shall serve without compensation except that the Secretary is authorized to pay reasonable expenses.

Section 4(d) provides for the election of the Chair and other officers of the Commission.

Section 4(e) authorizes the Commission to make such bylaws, rules and regulations as it considers necessary and waives the provisions of section 14(b) of the Federal Advisory Committee Act.

Section 5 authorizes such sums as may be necessary to be appropriated to carry out the purposes of this Act.

LEGISLATIVE HISTORY AND COMMITTEE RECOMMENDATIONS

The Subcommittee on National Parks and Public Lands held a hearing on H.R. 690 on March 7, 1991. The bill was reported to the Full Committee with amendments en bloc on March 21, 1991. The Committee on Interior and Insular Affairs ordered the bill favorably reported, as amended, to the House by voice vote on April 10, 1991.

OVERSIGHT STATEMENT

The Committee intends to carefully monitor the implementation of this legislation to ensure compliance with the intent of the Act. No recommendations were submitted to the Committee pursuant to Rule X, clause 2(b)(2).

INFLATIONARY IMPACT STATEMENT

Pursuant to Rule X, clause 2 of the Rules of the House of Representatives, the Committee finds that enactment of this measure would have no inflationary impact on the national economy.

COST AND BUDGET ACT COMPLIANCE

The Committee has determined that enactment of H.R. 690 will involve only a minimal increase in Federal expenditures. The report of the Congressional Budget Office, which the Committee adopts as its own, follows:

U.S. CONGRESS,
CONGRESSIONAL BUDGET OFFICE,
Washington, DC, April 15, 1991

Hon. GEORGE MILLER,
Vice Chairman, Committee on Interior and Insular Affairs, House
of Representatives, Washington, DC.

DEAR MR. CHAIRMAN: The Congressional Budget Office has reviewed H.R. 690, a bill to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site, and for other purposes. The bill was ordered reported by the House Committee on Interior and Insular Affairs on April 10, 1991. Assuming appropriation of the necessary sums,

CBO estimates that the federal government would incur one-time implementation costs of \$1 million to \$2 million. Most of this amount would be spent over fiscal years 1992 and 1993. Thereafter, about \$0.5 million would be spent each year for routine operation and maintenance. This bill would not affect direct spending or receipts, and thus would not involve pay-as-you-go scoring.

H.R. 690 would authorize the Secretary of the Interior to purchase or accept the donation of the Mary McLeod Bethune Council House and related property. The acquired property would be managed by the National Park Service (NPS) in consultation with a 15-member advisory commission. Under section 3(b) of the bill, the NPS would be authorized and directed to execute cooperative agreements with private organizations for the provision of interpretive services and archive administration. Section 5 of the bill would authorize the appropriation of whatever sums are necessary to carry out the bill.

The costs of implementing H.R. 690 would depend on the outcome of formal property appraisals, NPS planning studies, and, finally, negotiations with the nonprofit organizations that currently own and operate the Council House. Based upon the most recent NPS information available, CBO estimates that total upfront costs would be between \$1 million and \$2 million including acquisition, restoration, and development expenditures as well as upfront administrative and planning costs. Most of this spending would occur during fiscal years 1992 and 1993, assuming appropriation of the necessary sums.

Once acquisition has been completed, the NPS would spend about \$0.5 million to operate and maintain the site, including payments under section 3(b) of the bill.

Enactment of this bill would have no impact on state or local governments.

If you wish further details on this estimate, we will be pleased to provide them. The CBO staff contact is Deborah Reis, who can be reached at 226-2860.

Sincerely,

ROBERT D. REISCHAUER,
Director

Calendar No. 127

102 ND CONGRESS 1 ST Session	SENATE	REPORT 102-68
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AUTHORIZING THE NATIONAL PARK SERVICE TO ACQUIRE AND MANAGE
THE MARY McLEOD BETHUNE COUNCIL HOUSE NATIONAL HISTORIC
SITE, AND FOR OTHER PURPOSES

JUNE 21 legislative day, JUNE 11, 1991 —Ordered to be printed

Mr. JOHNSON, from the Committee on Energy and Natural
Resources, submitted the following

REPORT

(To accompany H.R. 690)

The Committee on Energy and Natural Resources, to which was referred the act (H.R. 690) to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site, and for other purposes, having considered the same, reports favorably thereon without amendment and recommends that the act do pass.

PURPOSE OF THE MEASURE

The purpose of H.R. 690, as ordered reported, is to authorize the Secretary of the Interior to acquire and manage the Mary McLeod Bethune National Historic Site in Washington, D.C.

BACKGROUND AND NEED

Mary McLeod Bethune (1875-1955) was a distinguished African-American educator, political activist and leader who devoted her life to championing the causes of African-American women. In 1904, she opened the Daytona Normal and Industrial Institute in Florida, which later became the Bethune-Cookman College. Mrs. Bethune remained President of the college until 1942.

Mrs. Bethune was also the founder of the National Council of Negro Women, which united the major African-American women's organizations into a national organization in 1935. She remained President of that organization until 1949. Mrs. Bethune also served as the President of the National Association of Teachers in Colored Schools, as Vice President of the Commission on Interracial Cooperation and as President of the Association for the Study of Negro Life and History.

10-111

Mrs. Bethune lived in her home, located at 4118 Vermont Avenue in Washington, from 1913 until 1919 and used the house as her headquarters from 1913 until her death in 1935.

The Bethune Museum and Archives opened in 1979, and was designated as a National Historic Site in 1982. The site has hosted exhibitions on African-American women's history and culture, held lecture and concert series, and provided reference services and educational publications for the public.

Although the Bethune Museum and Archives was designated as a National Historic Site in 1982, it is not a unit of the National Park System, but rather an affiliated area. H.R. 690 will allow the Secretary of the Interior to acquire the site (with the consent of the owner) and manage it as unit of the National Park System.

LEGISLATIVE HISTORY

H.R. 690, introduced by Congressman Lewis of Georgia, passed the House of Representatives by a voice vote on April 21, 1991. The Subcommittee on Public Lands, National Parks and Forests held a hearing on H.R. 690 on May 21, 1991.

At the business meeting on June 21, 1991, the Committee on Energy and Natural Resources ordered H.R. 690 favorably reported.

COMMITTEE RECOMMENDATIONS AND TABULATION OF VOTES

The Committee on Energy and Natural Resources, in open business session on June 12, 1991, by a unanimous vote of a quorum present, recommends that the Senate pass H.R. 690 as described herein.

The roll call vote on reporting the measure was 20 yeas, 0 nays, as follows:

YEAS
 Mr. Johnston
 Mr. Bumpers¹
 Mr. Ford
 Mr. Bradley¹
 Mr. Bingham
 Mr. Wirth
 Mr. Conrad¹
 Mr. Akaka
 Mr. Fowler¹
 Mr. Shelby
 Mr. Wellstone¹
 Mr. Wallop
 Mr. Hatfield
 Mr. Domenici¹
 Mr. Murkowski¹
 Mr. Nickles
 Mr. Burns
 Mr. Craig
 Mr. Seymour¹
 Mr. Dorn¹

NAYS

SECTION-IV-SECTION ANALYSIS

Section 1 sets forth the purposes of the Act, which are to preserve and interpret the life and work of Mary McLeod Bethune; the history, lives and contributions of African American women; and the struggle for civil rights in the United States.

Section 2 authorizes the Secretary of the Interior (the "Secretary") to acquire, by donation or purchase with donated or appropriated funds, the Mary McLeod Bethune National Historic Site (the "site") in Washington, D.C., together with such structures and improvements thereon and such personal property as the Secretary deems appropriate for interpretation of the site. The Secretary may only acquire the site with the consent of the owner.

The Committee notes that the National Park Service, in its sustainability/feasibility study, has indicated that it will conduct a structural investigation of the site to determine its capability to serve safely as an office and a public assembly space. While the Committee understands that the site has been safely operated in a similar capacity by the National Council of Negro Women and the Bethune Museum Archives, Inc., and that there are no known major structural defects, the Committee expects that the Secretary will complete the study prior to the acquisition of the site.

Section 3(a) directs the Secretary to administer the site in accordance with this Act, the National Park Service Organic Act of 1916 and the Historic Sites Act of 1935.

Subsection (b) directs the Secretary to enter into a cooperative agreement with non-profit organizations to provide public programs, seminars and lectures, and to administer the archives currently located at the site.

Subsection (c) provides that the site is to be operated and managed in accordance with a general management plan. The Secretary is directed to consult in the development of the plan with the Advisory Committee established pursuant to section 4.

Section 4 establishes the Mary McLeod Bethune Council House National Historic Site Advisory Commission, (the "Commission"). The Commission is to consist of 15 members appointed by the Secretary for four-year terms.

Section 5 authorizes the appropriation of such sums as may be necessary to carry out this Act.

COST AND BUDGETARY CONSIDERATIONS

The following estimate of the cost of this measure has been provided by the Congressional Budget Office:

U.S. CONGRESS
CONGRESSIONAL BUDGET OFFICE
Washington, DC, June 14, 1991

HON. J. BENNETT JOHNSTON, JR.,
Chairman, Committee on Energy and Natural Resources, U.S.
Senate, Washington, DC.

DEAR MR. CHAIRMAN: The Congressional Budget Office has reviewed H.R. 690, an act to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site, and to provide for the site's operation and maintenance.

I

reported by the Senate Committee on Energy and Natural Resources on June 12, 1991. Assuming appropriation of the necessary sums, CBO estimates that the federal government would incur one-time implementation costs of \$1 million to \$2 million. Most of this amount would be spent over fiscal years 1992 and 1993. Thereafter, about \$0.5 million would be spent each year for routine operation and maintenance. This legislation would not affect direct spending or receipts, and thus would not involve pay-as-you-go scoring.

H.R. 690 would authorize the Secretary of the Interior to purchase or accept the donation of the Mary McLeod Bethune Council House and related property. The acquired property would be managed by the National Park Service (NPS) in consultation with a 15-member advisory commission. Under section 3(b) of the act, the NPS would be authorized and directed to execute cooperative agreements with private organizations for the provision of interpretive services and archive administration. Section 5 would authorize the appropriation of whatever sums are necessary to carry out the act.

The costs of implementing H.R. 690 would depend on the outcome of formal property appraisals, NPS planning studies, and, finally, negotiations with the nonprofit organizations that currently own and operate the Council House. Based upon the most recent NPS information available, CBO estimates that total upfront costs would be between \$1 million and \$2 million including acquisition, restoration, and development expenditures as well as upfront administrative and planning costs. Most of this spending would occur during fiscal years 1992 and 1993, assuming appropriation of the necessary sums.

Once acquisition has been completed, the NPS would spend about \$0.5 million to operate and maintain the site, including payments under section 3(b) of the act.

Enactment of this legislation would have no impact on state or local governments.

On April 15, 1991, CBO prepared a cost estimate for H.R. 690 as ordered reported by the House Committee on Interior and Insular Affairs on April 10, 1991. The two estimates are identical.

If you wish further details on this estimate, we will be pleased to provide them. The CBO staff contact is Deborah Reis, who can be reached at 226-2860.

Sincerely,

ROBERT F. HALE
(For Robert D. Reischauer, Director)

REGULATORY IMPACT EVALUATION

In compliance with paragraph 1(b) of Rule XXVI of the Standing Rules of the Senate, the Committee makes the following evaluation of the regulatory impact which would be incurred in carrying out H.R. 690. The Act is not a regulatory measure in the sense of imposing Government-established standards or significant economic responsibilities on private individuals and businesses.

No personal information would be collected in administering the act.

Little, if any, additional paperwork would result from the enactment of H.R. 690, as ordered reported.

EXECUTIVE COMMUNICATIONS

On May 7, 1991, the Committee on Energy and Natural Resources requested legislative reports from the Department of the Interior and the Office of Management and Budget setting forth executive views on H.R. 690. These reports had not been received at the time the report on H.R. 690 was filed. When the reports become available, the Chairman will request that they be printed in the Congressional Record for the advice of the Senate. The testimony provided by the National Park Service at the Subcommittee hearing follows:

STATEMENT OF ROBERT STANTON, REGIONAL DIRECTOR, NATIONAL CAPITAL REGION, NATIONAL PARK SERVICE, DEPARTMENT OF THE INTERIOR

Mr. Chairman, I appreciate the opportunity to provide your subcommittee with the views of the Department of the Interior on H.R. 690 as amended by the House of Representatives, a bill to authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site.

Mr. Chairman, the Department of the Interior has approved a program of legislative initiatives for the National Park Service, based on the number one priority of each Region of the Park Service. This program of legislative initiatives includes the proposal to bring the Mary McLeod Bethune Council House and Bethune Museum Archives into the national park system through acquisition. If amended as we suggest below, we support H.R. 690.

The Mary McLeod Bethune Council House and the National Archives for Black Women's History were designated a national historic site in 1982 by Public Law 97-429. That authorizing legislation directed the Secretary of the Interior to enter into a cooperative agreement with the National Council of Negro Women. The site and the archives have been operated by the National Council, in conjunction with the Bethune Museum Archives, Inc., since that legislation was enacted. The purpose of the site as directed in the 1982 legislation included (1) the preservation, maintenance, and interpretation of the Council House and site because of the historic meaning and prominence of the life and achievements of Mary McLeod Bethune, an outstanding leader in the area of housing, employment, civil rights, and women's rights, and (2) the continuation of the Mary McLeod Bethune Memorial Museum and the National Archives for Black Women's History at this site.

H.R. 690 would authorize the Secretary of the Interior to acquire the Mary McLeod Bethune Council House National Historic Site and to manage and operate the site after

operative agreement with nonprofit organizations to provide the public programs, seminars, and lectures appropriate to interpret the life and work of Mary McLeod Bethune and the history and contributions of African-American women.

H.R. 690 would also authorize the Secretary to acquire the National Archives for Black Women's History, and the Secretary is directed to enter into a cooperative agreement with nonprofit organizations to administer the archives currently located at the historic site.

In testimony March 7, 1991, before the House of Representatives, we raised three issues regarding this proposed legislation. These issues are addressed in a study that has recently been completed and reviewed for this site. These include:

1. H.R. 690 significantly expands the existing scope of the Council House and the archives. Under H.R. 610 the site would preserve and interpret the life of Mary McLeod Bethune, the history, lives, and contributions of African-American women, and the struggle for civil rights in the United States. This expanded scope would significantly affect the operations and the operating budget of the Council House and the archives. We intend to continue to focus our interpretation of this site on the history of the civil rights movement, and Mary McLeod Bethune's contributions to that history; we do not intend to interpret contemporary political and civil activity occurring in the ongoing current civil rights movement. We recommend that the purpose of the site be to preserve and interpret the life and work of Mary McLeod Bethune and her contemporaries and the history and ongoing work of the National Council of Negro Women.

2. If the scope of the archives is expanded as described in H.R. 610, and additional material is acquired to the scope described in this bill, the existing carriage house would soon become inadequate to store the archives that are now an integral part of the site. We recommend that the scope of the archives be the life and work of Mary McLeod Bethune and her contemporaries who were leaders in fields of endeavor similar to Mary McLeod Bethune.

3. Section (c) includes language that the Advisory Commission "shall fully participate with the Secretary in the development of the General Management Plan." To avoid a possible constitutional appointments clause infirmity, the Department of Justice advised that this provision should be rephrased to clarify that the Advisory Commission truly has an advisory, rather than executive, role.

Our third request was incorporated into H.R. 610 as amended, however, the first two issues remain. We would be pleased to meet with members and staff of the subcommittee for further discussion of these issues.

In addition, the bill as passed in the House of Representatives requires a correction. In Section 3, ADMINISTRATION, the subcommittee AMENDMENTS AND DELETED

7

MENT should be identified as subsection "(C)" rather than paragraph "(2)".

The estimated cost for acquiring the land and structures is \$615,000. We would anticipate that the archives and historical furnishings will be donated to the Park Service by the National Council of Negro Women. Development and planning costs, including preservation of the structures, are estimated to total \$1,500,000. Annual operating costs are estimated to total \$100,000.

That concludes my prepared testimony, and I would be happy to answer any questions you may have.

CHANGES IN EXISTING LAW

In compliance with paragraph 12 of rule XXVI of the Standing Rules of the Senate, the Committee notes that no changes in existing law are made by the Act of H.R. 1201, as ordered reported.

○

105 STAT. 1652

PUBLIC LAW 102-211—DEC. 11, 1991

Public Law 102-211
102d Congress

An Act

Dec. 11, 1991.
(H.R. 690)

To authorize the National Park Service to acquire and manage the Mary McLeod Bethune Council House National Historic Site, and for other purposes

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

16 USC 461 note

SECTION 1. PURPOSES.

The purposes of this Act are to—

- (1) preserve and interpret the life and work of Mary McLeod Bethune;
- (2) preserve and interpret the history, lives, and contributions of African American women; and
- (3) preserve and interpret the struggle for civil rights in the United States of America

District of
Columbia

16 USC 461 note

SEC. 2. ACQUISITION.

The Secretary of the Interior (hereinafter in this Act referred to as the "Secretary") may acquire, with the consent of the owner thereof, by donation or by purchase with donated or appropriated funds, the property designated under the Act of October 15, 1982 (Public Law 97-329; 96 Stat. 1615), as the Mary McLeod Bethune Council House National Historic Site, located at 1318 Vermont Avenue, N.W., Washington, D.C., together with such structures and improvements thereon and such personal property associated with the site as he deems appropriate for interpretation of the site

16 USC 461 note

SEC. 3. ADMINISTRATION.

(a) IN GENERAL.—Upon acquisition of the property described in section 2, the cooperative agreement referred to in section 3 of the Act of October 15, 1982 (Public Law 97-329; 96 Stat. 1615) shall cease to have any force and effect, and upon acquisition of such property, the Secretary shall administer the Mary McLeod Bethune Council House National Historic Site (hereinafter in this Act referred to as the "historic site") in accordance with this Act and in accordance with the provisions of law generally applicable to units of the national park system, including the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916 (39 Stat. 535; 16 U.S.C. 1, 2-4) and the Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-467)

(b) COOPERATIVE AGREEMENT.—(1) The Secretary is authorized and directed to enter into a cooperative agreement with nonprofit organizations dedicated to preserving and interpreting the life and work of Mary McLeod Bethune and the history and contributions of African American women—

- (A) to provide to the public such programs, seminars, and lectures as are appropriate to interpret the life and work of Mary McLeod Bethune and the history and contributions of African American women, and

PUBLIC LAW 102-211—DEC. 11, 1991

105 STAT. 1653

(B) to administer the archives currently located at the historic site, including providing reasonable access to the archives by scholars and other interested parties.

(2) The Secretary is authorized to provide space and administrative support for such nonprofit organization.

(c) **MANAGEMENT AND DEVELOPMENT.**—The historic site shall be operated and managed in accordance with a General Management Plan. The Advisory Commission appointed under section 4 shall fully participate in an advisory capacity with the Secretary in the development of the General Management Plan for the historic site. The Secretary and the Advisory Commission shall meet and consult on matters relating to the management and development of the historic site as often as necessary, but at least semiannually.

SEC. 4. ADVISORY COMMISSION.

16 USC 461 note

(a) **ESTABLISHMENT.**—There is hereby established the Mary McLeod Bethune Council House National Historic Site Advisory Commission (hereinafter in this Act referred to as the "Commission"). The Commission shall carry out the functions specified in section 3(c) of this Act.

(b) **MEMBERSHIP.**—The Commission shall be composed of 15 members appointed by the Secretary for 4-year terms as follows:

(1) 3 members appointed from recommendations submitted by the National Council of Negro Women, Inc.

(2) 2 members appointed from recommendations submitted by other national organizations in which Mary McLeod Bethune played a leadership role.

(3) 2 members appointed from recommendations submitted by the Bethune Museum and Archives, Inc.

(4) 2 members who shall have professional expertise in the history of African American women.

(5) 2 members who shall have professional expertise in archival management.

(6) 3 members who shall represent the general public.

(7) 1 member who shall have professional expertise in historic preservation.

Any member of the Commission appointed for a definite term may serve after the expiration of his or her term until his or her successor is appointed. A vacancy in the Commission shall be filled in the same manner in which the original appointment was made.

(c) **COMPENSATION.**—Members of the Commission shall serve without compensation except that the Secretary is authorized to pay such expenses as are reasonably incurred by the members in carrying out their responsibilities under this Act.

(d) **OFFICERS.**—The Chair and other officers of the Commission shall be elected by a majority of the members of the Commission to serve for terms established by the Commission.

(e) **BYLAWS, RULES, AND REGULATIONS.**—The Commission shall make such bylaws, rules, and regulations as it considers necessary to

105 STAT. 1654

PUBLIC LAW 102-211—DEC. 11, 1991

carry out its functions under this Act. The provisions of section 14(b) of the Federal Advisory Committee Act (5 U.S.C. Appendix) are hereby waived with respect to this Commission.

16 USC 461 note. SEC. 5. AUTHORIZATION OF APPROPRIATIONS.

There are hereby authorized to be appropriated such sums as may be necessary to carry out this Act.

Approved December 11, 1991.

LEGISLATIVE HISTORY—H.R. 690:

HOUSE REPORTS: No. 102-36 (Comm. on Interior and Insular Affairs).
SENATE REPORTS: No. 102-88 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD, Vol. 137 (1991):
Apr. 24, considered and passed House.
Oct. 24, considered and passed Senate, amended.
Nov. 26, Senate receded from its amendment.

APPENDIX B: LETTER REGARDING ENDANGERED SPECIES



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Field Office
177 Admiral Unanue Drive
Annapolis, MD 21401



June 28, 2000

Ms. Margaret L. DeLaura
Community Planner
National Park Service
Denver Service Center
12795 W. Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225 - 0287

RE: Mary McLeod Bethune Council
House National Historic Site
Washington, District of Columbia

Dear Ms. DeLaura:

This responds to your June 2, 2000, request for information on the presence of species which are federally listed or proposed for listing as endangered or threatened in the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended, 16 U.S.C. 1531 *et seq.*)

Except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the project impact area. Therefore, no Biological Assessment or further Section 7 consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or should additional information on the distribution of listed or proposed species become available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. Limited information is currently available regarding the distribution of other rare species in the District of Columbia. However, the Nature Conservancy and National Park Service (NPS) have initiated an inventory of rare species within the District. For further information on such rare species, you should contact Ellen Gray of the DC Natural Heritage Program at (202) 342-1443 ext. 223.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's

APPENDICES

remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if alterations of wetlands proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Andy Moser at (410) 573-4557.

Sincerely,



Robert J. Pennington
Assistant Field Supervisor
Chesapeake Bay Field Office

APPENDIX C: COST ESTIMATE DETAILS

ALTERNATIVE ONE					
Area	Description	Qty .	Unit	Cost/Unit	Net Cost
Carriage House	1 st Floor Archives	552	Sq ft		
	Restroom/storage	138	Sq ft		
	2nd Floor Office	690	Sq ft		
Council House	1 st Floor Interpretation	1,150	Sq ft		
	Stairs and hall	314	Sq ft		
	Bookstore	100	Sq ft		
	2nd Floor Interpretation	1,070	Sq ft		
	Stairs and hall	314	Sq ft		
	Office	100	Sq ft		
	Restroom	80	Sq ft		
	3 rd Floor Office	1,250	Sq ft		
Exhibits	Stairs and hall	314	Sq ft		
	Renov ate existing	2,220	Sq ft	\$ 300	\$ 666,000
Total					\$ 666,000

ALTERNATIVE TWO					
Area	Description	Qty .	Unit	Cost/Unit	Net Cost
Carriage House	1 st Floor Archives	552	Sq ft		
	Restroom/storage	138	Sq ft		
	2nd Floor Office	690	Sq ft		
Council House	1st Floor Interpretation	1,150	Sq ft		
	Stairs and hall	314	Sq ft		
	Bookstore	100	Sq ft		
	2nd Floor Interpretation	1,070	Sq ft		
	Stairs and hall	314	Sq ft		
	Office	100	Sq ft		
	Restroom	80	Sq ft		
	3rd Floor Office	1,250	Sq ft		
Exhibits	Stairs and hall	314	Sq ft		
	Renov ate existing/add new	3,470	Sq ft	\$ 300	\$ 1,041,000
New Space	Interpretive	2,650			
	Research lab	600			
	Additional office	1,286			
	New space subtotal	4,536	Sq ft	\$ 215	\$ 975,000
	Rehabilitation (Nonstructural)	4,536	Sq ft	\$ 80	\$ 363,800
Total					\$ 2,379,000

APPENDIXES

ALTERNATIVE THREE					
Area	Description	Qty .	Unit	Cost/Unit	Net Cost
Carriage House	1st Floor Archives	552	Sq ft		
	Restroom/storage	138	Sq ft		
	2nd Floor Office	690	Sq ft		
	Remodel (structural)	1,380	Sq ft	\$ 180	\$ 248,000
	New space	690	Sq ft	\$ 200	\$ 138,000
Council House	1st Floor Interpretation	1,150	Sq ft		
	Stairs and hall	314	Sq ft		
	Bookstore	100	Sq ft		
	2nd Floor Interpretation	1,070	Sq ft		
	Stairs and hall	314	Sq ft		
	Office	100	Sq ft		
	Restroom	80	Sq ft		
	3rd Floor Office	1,250	Sq ft		
	Stairs and hall	314	Sq ft		
Exhibits	Renov ate existing/add new	2,720	Sq ft	\$ 300	\$ 816,000
New Space	Conference rooms, exhibits	1,250			
	Additional office	1,878			
	New Space Subtotal	3,128	Sq ft	\$ 215	\$ 673,000
	Rehabilitation (nonstructural)	3,128	Sq ft	\$ 80	\$ 250,000
TOTAL					\$ 2,125,000

ALTERNATIVE FOUR					
Area	Description	Qty .	Unit	Cost/Unit	Net Cost
Carriage House	1st Floor Archives	552	Sq ft		
	Restroom/storage	138	Sq ft		
	2nd Floor Office	690	Sq ft		
	Demolish Existing Building	1,380	Sq ft	\$ 10	\$ 14,000
	Public restroom/bookstore	650	Sq ft		
	Office	1,216	Sq ft		
	New Space Subtotal	1,866	Sq ft	\$ 250	\$ 467,000
Council House	1st Floor Interpretation	1,150	Sq ft		
	Stairs and hall	314	Sq ft		
	Bookstore	100	Sq ft		
	2nd Floor Interpretation	1,070	Sq ft		
	Stairs and hall	314	Sq ft		
	Office	100	Sq ft		
	Restroom	80	Sq ft		
	3rd Floor Office	1,250	Sq ft		
Exhibits	Stairs and hall	314	Sq ft		
	Renov ate existing/add new	3,470	Sq ft	\$ 300	\$ 1,041,000
TOTAL					\$ 1,522,000

Project/Location: Mary McLeod Bethune Council House NHS □ General Management Plan

7/10/00

Subject Functional Component

Description

Project Life Cycle = **25 years**

Discount Rate = **7.00%**

Present Time = **Current Date**

			Alternative 1		Alternative 2		Alternative 3		Alternative 4	
INITIAL COSTS	Quantity UM	Unit Price	Est.	PW	Est.	PW	Est.	PW	Est.	PW
Construction Costs										
A. _____	_____	\$0.00	666,000	666,000	2,379,120	2,379,120	2,125,160	2,125,160	1,521,300	1,521,300
B. _____	_____	\$0.00	_____	_____	_____	_____	_____	_____	_____	0
C. _____	_____	\$0.00	_____	_____	_____	_____	_____	_____	_____	0
D. _____	_____	\$0.00	_____	_____	_____	_____	_____	_____	_____	0
E. _____	_____	\$0.00	_____	_____	_____	_____	_____	_____	_____	0
F. _____	_____	\$0.00	_____	_____	_____	_____	_____	_____	_____	0
G. _____	_____	_____	_____	_____	_____	_____	_____	_____	_____	0
Total Initial Costs				666,000		2,379,120		2,125,160		1,521,300
Initial Cost PW Savings (Compared to Alt. 1)						(1,713,120)		(1,459,160)		(855,300)
REPLACEMENT COST/SALVAGE VALUE										
Description	Year	PW Factor								
A. Visitor Orientation, Replace	5	0.7130	_____	0	195,046	139,066	167,624	119,513	_____	0
B. Visitor Orientation, Replace	10	0.5083	_____	0	195,046	99,152	167,624	85,211	_____	0
B. Visitor Orientation, Replace	15	0.3624	_____	0	195,046	70,694	167,624	60,754	_____	0
B. Visitor Orientation, Replace	20	0.2584	_____	0	195,046	50,404	167,624	43,317	_____	0
C. _____	0	1.000	_____	0	_____	0	_____	0	_____	0
D. _____	0	1.000	_____	0	_____	0	_____	0	_____	0
E. _____	0	1.000	_____	0	_____	0	_____	0	_____	0
Total Replacement/Salvage Costs				0		359,316		308,795		0
ANNUAL COSTS										
Description	Escl. %	PW A								
A. Leasing	0.00%	11,654	_____	0	_____	0	_____	0	22,080	257,311
B. Staffing	0.00%	11,654	318,000	3,705,839	689,000	8,029,319	742,000	8,646,859	371,000	4,323,479
C. _____	0.00%	11,654	_____	0	_____	0	_____	0	_____	0
D. _____	0.00%	11,654	_____	0	_____	0	_____	0	_____	0
E. _____	0.00%	11,654	_____	0	_____	0	_____	0	_____	0
F. _____	0.00%	11,654	_____	0	_____	0	_____	0	_____	0
Total Annual Costs (present worth)				3,705,839		8,029,319		8,646,959		4,580,790
Total Life Cycle Costs (present worth)				4,371,639		10,767,755		11,080,914		6,102,090
Life Cycle Savings (compared to Alt. 1)						(6,395,915)		(6,709,074)		(1,730,251)

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